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GRAZING MANAGEMENT

FINAL ENVIRONMENTAL IMPACT STATEMENT

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Price River Resource Area

1983

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FINAL

ENVIRONMENTAL IMPACT STATEMENT

Proposed

GRAZING MANAGEMENT PROGRAM FOR THE PRICE RIVER RESOURCE AREA, CARBON AND EMERY COUNTIES, UTAH

Prepared by

Department of the Interior
Bureau of Land Management
Price River Resource Area
January 1983

The Bureau of Land Management proposes to implement a grazing management program on 1,087,676 acres of public land in the Price River Resource Area in southeastern Utah. The objectives of the program are to improve vegetation condition and increase forage production for multiple use on a sustained yield basis. This statement assesses the environmental consequences of four alternative management programs including no action. The agency preferred alternative for initial action is Alternative D No Action wherein no significant changes in current livestock management would be made, pending the outcome of monitoring studies. The environmental consequences of each alternative are summarized in the Summary, compared in Chapter 1, and fully described in Chapter 3 of the DEIS.

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Date by which comments are due: February 15, 1983

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SUMMARY

Purpose and Need

The Bureau of Land Management (BLM) proposes the implementation of a grazing management program on public lands in the Price River Resource Area. The area includes approximately 1.7 million acres and 118 grazing allotments in Carbon, Emery, Utah, Uintah, and Duchesne Counties, Utah. Approximately 63 percent of the area is Federal land, 11 percent is State land, and 26 percent is private land.

The objective of the grazing management program is to maintain or improve the productivity of rangelands on a sustained yield basis while providing for multiple use and stabilization of the livestock industry within the EIS area. To help determine ways to meet this objective and identify significant issues in the area, the BLM held a series of scoping meetings and other contacts with agencies and individuals between 1978 and 1982. Some of the issues discussed in this EIS came from this scoping process.

Resource inventories began in 1978 showed the need for changes in the current grazing management program. The inventory indicated that ecological condition on public lands in the area is 5 percent climax (excellent), 25 percent late seral (good), 42 percent mid seral (fair), and 28 percent early seral (poor).

Significant Issues to be Addressed

As a result of the scoping process and interdisciplinary team meetings, the following issues were identified as being significant: 1. Wildlife-livestock competition, 2. Livestock-recreation conflicts, 3. The contribution of livestock grazing to Colorado River salinity, 4. Livestock distribution and its effect on range condition. Other issues were raised, but were determined to be insignificant or beyond the scope of this EIS.

Selective Management Categories

The allotments in the EIS area were categorized into Maintain, Improve, and Custodial categories to establish management priorities for distribution of funds and manpower. Efforts and money would be concentrated in those areas where action is most needed to resolve serious resource-use conflicts or to improve basic resources.

Alternatives Including the Proposed Action

There were four alternatives developed in planning and carried forward into the EIS. They are: A, Enhance Livestock Production; B, Planning Recommendation; C, Enhance Watershed, Wildlife, and Recreation; D, No Action. Key elements of these alternatives are summarized in Table S-1.

TABLE S-1

Summary of Forage Allocation, Management Features, and Vegetation Manipulation for Alternatives

	Alternatives					
Management Features	A. Enhance Livestock Production	B. Planning Recommendation	C. Enhance Watershed, Wildlife & Recreation	D. No Action	Active Preference	Average Licensed Use
Livestock Forage Allocation						
Cattle AMs	39,435	36,074	19,851	45,076	45,076	30,306
Sheep AMs	172,867	7,696	5,631	40,955	40,955	6,417
Wildlife Forage Availability					Present Wildlife Demand	
Deer AMs	48,611	175,481	177,020	133,526	128,137	
Antelope AMs	3,381	77,900	74,722	63,396	5,196	
Elk AMs	2,661	27,658	27,715	21,079	5,323	
Desert Bighorn Sheep AMs	173	13,179	17,428	16,983	180	
Rocky Mountain Sheep AMs	673	13,478	14,234	8,490	636	
Moose AMs	181	1,396	1,471	1,353	96	
Wild Horse AMs	300	489	839	347	300	
Allotments with Season of Use Changes	90	51	90	0		
Number of Allotment Boundary Changes	9	9	9	0		
Number of Mitigating Livestock Grazing Restrictions	0	8	10	2		
Vegetation Manipulations						
Acres Chained	47,158	0	0	0		
Acres Chain and Seed	21,174	30,774	0	0		
Acres Herbicide Spray	6,746	625	0	0		
Acres Prescribed Burn	1,150	6,036	0	0		
Acres Plow and Seed	3,098	1,316	0	0		
Total Acres	79,326	38,751	0	0		
Predicted Cattle AMs Gained	10,192	7,032	0	0		

A, Enhance Livestock Production. The objective of this alternative is to maximize the production of livestock forage on public lands on a sustained yield basis. The enhancement of watershed, wildlife, and outdoor recreation is secondary to livestock production. Changes in livestock season of use are proposed on all categories of allotments to favor vegetative production. No livestock grazing restrictions to avoid conflict with other uses are proposed, and wildlife introductions would be allowed only if there would be no adverse impact to livestock. Allotment boundary changes are proposed for better management and monitoring studies would be initiated. Proposed forage allocation and vegetation manipulation are shown in Table S-1.

B, Planning Recommendation. The objective of this alternative is to provide livestock forage on a sustained yield basis without causing undue degradation of other resource values or uses. Season of use changes are proposed on I Category allotments only. Wildlife introductions would be allowed, and allotment boundary changes would be as proposed in Alternative A. Livestock grazing restrictions are proposed to avoid or mitigate conflicts with wildlife, watershed, and recreation use. Monitoring studies are also proposed. Proposed forage allocation and vegetation manipulation are shown in Table S-1.

C, Enhance Watershed, Wildlife, and Recreation. The objective of this alternative is to use reduced or modified livestock grazing to enhance watershed values, wildlife productivity, and outdoor recreation user's experience. Season of use and allotment boundary changes are the same as Alternative A. Wildlife introductions are allowed, and livestock grazing restrictions are proposed to benefit watershed, wildlife, and recreation use. Monitoring studies are also proposed. Proposed forage allocation is shown in Table S-1. No vegetation manipulation for the benefit of livestock is proposed.

D, No Action. The objective of this alternative is to maintain the status quo and not disrupt current livestock operations. Season of use, forage allocation, and kind of livestock would continue as presently authorized. For a worst-case analysis, active preference is considered as present authorized allocation. No new studies, monitoring, range developments, or vegetation manipulation projects would be done. Existing studies and facilities would be maintained. Present forage allocation (active preference) and average licensed use are shown in Table S-1.

Mitigating measures in the form of standard operating procedures are incorporated into each alternative to avoid or mitigate some adverse impacts. The allotments have been categorized into selective management categories Maintain, Improve, and Custodial for prioritization of management actions and funds. A monitoring program is also proposed to determine the results of management actions that are implemented.

Environmental Consequences

The environmental consequences of implementing the alternatives have been analyzed by an interdisciplinary team, and their analysis documented in the EIS. The major measurable impacts of the alternatives are summarized in Table S-2. The team did not identify any significant adverse or beneficial impacts to climate, air quality, topography, geology, minerals, cultural resources, visual resources, wilderness, threatened or endangered species, or urban land use, that would result from implementation of any of the alternatives. A brief account of the impacts by resource follows.

Vegetation

Vegetation would generally improve under all alternatives except Alternative D. Some high use areas such as riparian and wet meadow would continue to decline especially under Alternative A where no livestock grazing restrictions are proposed. Vigor and production would increase and vegetation manipulation projects proposed in Alternatives A and B would further increase production.

Livestock Grazing

The use of forage by livestock would increase from the current average licensed use in all alternatives except Alternative C where significant reductions would occur. Season of use changes in all alternatives except D, No Action would alter some livestock operations and increase operating costs. The development of grazing systems as proposed in Alternatives A and B would also cause changes in current operations.

Wildlife

Big game populations would generally decrease under Alternative A except for moose which would not change. The big game populations would generally increase under Alternatives B, C, and D; however, on some herd units reductions would be necessary to protect critical winter ranges. Alternatives B and C propose livestock grazing restrictions to favor wildlife, and these would reduce competition from livestock and enhance big game habitat. Sage grouse habitat and productivity would generally decline under all alternatives except Alternative C.

The current degradation of aquatic habitat by livestock grazing use would continue if Alternatives A or D were implemented. Decreased fishery production and reduction of habitat would result. Under Alternatives B and C habitat quality would improve and habitat would expand resulting in increased fishery production.

Watershed

Watershed conditions would decline under Alternatives A and D, remain static under Alternative B and improve under Alternative C. Water consumption

Table S-2

Summary of Environmental Consequences

	Changes From Existing Situation[a]							
Resource	Alternative A		Alternative B		Alternative C		Alternative D[b]	
Vegetation								
Ecological Condition	Improve		Improve		Improve		Decline	
Livestock Grazing								
Allocation:								
Cattle AMs	Increase	9,129	Increase	5,768	Decrease	10,455	Increase	14,770
Sheep AMs	Increase	166,450	Increase	1,279	Decrease	786	Increase	34,538
Wildlife								
Forage Available (AMs)								
Deer	Decrease	62,371	Increase	79,991	Increase	86,899	Increase	33,351
Antelope	Decrease	1,784	Increase	73,634	Increase	72,483	Increase	54,315
Elk	Decrease	2,662	Increase	22,335	Increase	22,392	Increase	15,576
Moose	Increase	85	Increase	1,300	Increase	1,375	Increase	1,257
Desert Bighorn	Decrease	7	Increase	12,999	Increase	17,248	Increase	16,803
Rocky Mtn. Bighorn	Increase	37	Increase	12,842	Increase	13,598	Increase	7,854
Wild Horses	No change	------	Increase	189	Increase	539	Increase	47
Watershed								
Condition Trend:	Decline		Static		Improve		Decline	
Livestock Water Consumption:	Increase	100 acre-feet	Increase	15 acre-feet	Decrease	25 acre-feet	Increase	50 acre-feet
Forest Products								
Fuelwood Available on P-J Chainings:	10,250 cords		4,616 cords		No chainings		No chainings	
Recreation								
Visitor Days:								
Hunting	Decrease	40,138	Increase	4,070	Increase	9,402	Increase	3,866
Boating[c]	Increase	2,700	Increase	2,700	Increase	2,700	Increase	2,700
Economics								
Operator Income:	Increase	$1,167,014	Decrease	$ 79,115	Decrease	$ 524,835	Decline in long term	
Ranch Value:	Decrease	120,240	Decrease	939,228	Decrease	1,937,400	No change	------
Regional Income:								
Livestock	Increase	104,000	Increase	53,000	Decrease	650,735	No change	------
Hunting	Decrease	924,000	Increase	93,000	Increase	215,000	Increase	$ 89,000
Boating	No change	-------	No change	------	No change	--------	No change	------
Regional Jobs:	Decrease	49	Increase	9	Decrease	10	Increase	6

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[a] Impacts based on changes from last 5 years average licensed livestock use.
[b] Impacts resulting from licensing to active preference level for livestock.
[c] Increase from 5 year average use of 32,300 to restricted use level of 35,000 visitor days annually.

by livestock would increase in all alternatives except Alternative C where livestock use would be reduced.

Forest Products

Chaining of pinyon-juniper areas as proposed in Alternatives A and B would make available additional fuelwood which could be harvested by commercial or private interests.

Recreation

Visitor days for big game hunting would increase under all alternatives except Alternative A where a significant decline in hunter days is expected. Small game hunting pressure would not change under any alternative. The increase in visitor days for hunting would result from increased wildlife populations and expansion of herds that are not presently hunted because of their current low population levels.

Boating activity on the Green River would increase slightly from the current 5-year average use to the restricted-use level imposed by the BLM.

Economics

Operator income would increase under Alternatives A and B, decrease under Alternative C, and not change initially under Alternative D. In the long term operator income would decline under Alternative D. Ranch value, based on grazing permits, would generally decrease under all alternatives. This may be offset if operators change their operations to use available sheep forage.

The effects on the regional economy from activities that would be affected by livestock grazing management are variable. Regional income generated by the livestock industry would increase under Alternatives A and B, decrease under Alternative C, and not change under Alternative D. Income from hunting would increase for all alternatives except Alternative A where it would decrease. Income from boating on the Green River is not expected to change.

The regional employment would increase slightly under Alternatives B and D, but it would decrease under Alternatives A and C due to decreases in hunting- and livestock-related jobs, respectively.

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CHAPTER 4

CONSULTATION & COORDINATION

PUBLIC INVOLVEMENT

Efforts to involve the public in the MFP and EIS and to obtain input included public meetings, meetings with organizations and individuals, radio talk shows, news releases, and mailings to individuals. In early 1978, at the beginning of the SVIM inventory, livestock operators were invited by letter to a meeting held to acquaint them with the inventory scope and methodology. Personnel from the Resource Area participated in a Price River EIS Rancher Workshop held at College of Eastern Utah on March 28, 1980. Other participants included Utah State Extension Service, Utah Department of Natural Resources, and the Utah Department of Agriculture. During the summer of 1980, questionnaires requesting ranch economic data were sent to 84 permittees, and 69 replies were received. On October 16, 1980 and January 27, 1982, Resource Area personnel discussed planning and the grazing management EIS on a radio talk show on Price radio stations KOAL and KARB. A public scoping meeting was scheduled, and letters inviting the recipients to the meeting or to submit written comments were sent to 224 persons. The meeting was also advertised by news release and a Federal Register notice.

Issues Raised at Public Meetings

The following issues were raised at public meetings and in written comments: (1) ORV management and the possibility of closing some areas to ORV use, (2) continuation of the present fuelwood and Christmas tree permit system, (3) management of WSAs within the Resource Area, (4) conflicts between livestock grazing and boater use on the Green River, particularly in Desolation Canyon, (5) the deterioration of water quality in the area resulting from a variety of uses, (6) forage demand conflicts between livestock and wildlife, (7) possible competition with livestock from proposed big game reintroductions in the area, (8) the conflict of mining and energy developments with livestock grazing, (9) UDWR's management of deer herds on public lands, (10) the predator control program as it affects livestock operators, and (11) the number of restrictions placed on exploration and development of minerals, oil, and gas. Some of these issues do not relate specifically to the proposed grazing management program discussed in this EIS.

Alternatives Considered But Not Analyzed

No other alternative grazing management proposals were suggested in public meetings or in meetings with individuals or agencies. The alternative, "Elimination of Livestock Grazing" was considered by the interdisciplinary team, but was not included in this EIS. Total elimination of livestock grazing on all allotments in the EIS area would not be consistent with BLM policy as established by law (Taylor Grazing Act, 1934; Public Rangelands Improvement Act of 1978; and Federal Land Policy and Management Act of

1976). Where necessary, elimination of livestock grazing has been proposed on individual allotments or specific areas within allotments (under other alternatives), and the impacts of these proposals have been analyzed.

Date of Notice of Intent in Federal Register

A notice of intent to prepare an EIS on the grazing management program for the Price River Resource Area was printed in the Federal Register December 18, 1981.

Public Scoping Meeting

A public scoping meeting was held February 3, 1982 in the Price River Resource Area Office in Price, Utah. The meeting was advertised by newspaper, radio, Federal Register notice, and letters to individuals who expressed interest or might be affected by the proposed planning and grazing management program. Fifty-nine persons attended the meeting, and this group represented a broad range of interests. The following groups were represented at the meeting: Federal, State, and local government agencies; mining and energy industry; livestock industry; recreationists; wilderness advocates; League of Women Voters; and news media.

AGENCIES AND ORGANIZATIONS CONSULTED

In addition to the public contacts outlined previously, the interdisciplinary team also consulted with other individuals, agencies, and organizations having interest, expertise, or jurisdiction. Meetings to coordinate planning were held with personnel from BLM and Forest Service districts that have contiguous lands. The Soil Conservation Service and Bureau of Reclamation were consulted about proposed salinity studies on the Price and San Rafael rivers, and the effects of livestock grazing on salinity in the area. The Fish and Wildlife Service was consulted regarding threatened or endangered species in the area and any effects of proposed grazing management on species present.

A meeting was held with personnel from the Southeastern Regional Office of UDWR. Big game numbers, proposed reintroductions, sensitive, threatened or endangered species, and wildlife use areas were discussed. At a meeting with representatives from the Southeastern Utah Association of Governments, the issue of commercial and private fuelwood gathering was raised. The cost effectiveness of big game reintroductions, and ORV management in relation to water quality were also discussed.

A BLM representative attended the Utah Chapter of Western River Guides Association convention in Salt Lake City and invited input on grazing management and livestock use along the Green River. Meetings were also held with the Price River Watershed Soil Conservation District Board and the East Carbon Wildlife Federation to acquaint them with proposed grazing management alternatives for the area. Letters soliciting comments or identification of issues were sent to the Bureau of Indian Affairs Office and the Ute Tribal Council Chairman at Fort Duchesne. There were no replies to this correspondence.

LIST OF AGENCIES, ORGANIZATIONS AND PERSONS TO WHOM COPIES OF THE STATEMENT ARE SENT AND COMMENTS REQUESTED

Comments on the Draft Environmental Impact Statement were requested from the following agencies, organizations, and persons. Comments were received from those marked with an asterisk.

Federal

Advisory Council on Historic Preservation

Agricultural Stabilization and Conservation Service

*Bureau of Reclamation

*Environmental Protection Agency

Forest Service

Fish and Wildlife Service

Geological Survey

Soil Conservation Service

Regional Solicitor

State of Utah

*Clearing House (A-95)

Department of Agriculture

Department of Natural Resources

*Division of History (State Historic Preservation Officer)

Division of Lands and Forestry

Division of Water Rights

*Division of Wildlife Resources

Utah State University Extension Service

Local Agencies

Carbon County Commission

Emery County Commission

Price River Watershed Soil Conservation District

Southeastern Utah Association of Governments

Other Organizations or Persons

Ada County Fish and Game League

American Motorcyclist Association

Audubon Society

Brigham Young University

National Mustang Association

Natural Resources Defense Council

Public Lands Institute

Sierra Club

*Carbon County Extension Agent

*Carbon-Emery Wildlife Federation

Carbon-Emery Woolgrowers

Defenders of the Outdoor Heritage

*East Carbon Wildlife Federation

Eastern Utah Cattle Growers

Emery County Extension Agent

Environmental Defense Fund

Friends of the Earth

*Livestock Operators

National Humane Society

*Moab District Grazing Advisory Board

*Slickrock Outdoor Society

The Wilderness Society

Utah Cattlemen's Association

*Utah Farm Bureau

*Utah Wilderness Association

Utah Wildlife and Outdoor Recreation Federation

Utah Wool Grower's Association

*Wild Horse Organized Assistance

Western River Guides Association

COORDINATION IN REVIEW OF THE DRAFT EIS

The Draft EIS was filed with the Environmental Protection Agency (EPA) September 7, 1982. The BLM notice of availability and public hearing appeared in the Federal Register September 3. The EPA Federal Register notice appeared in the September 17 edition and announced a 60-day comment period extending to November 1. Approximately 350 copies of the Draft EIS were distributed to federal, state, and local governmental agencies, groups, organizations, and individuals for their review and comments.

On November 1 the BLM received a written request from Mr. Boyd Marsing of the Moab District Grazing Advisory Board requesting an extension of the comment period. The request was granted and a 30-day extension to November 30 was announced by District Manager Gene Nodine in a news release and Federal Register notice dated November 12, 1982.

Public Hearing

A public hearing was held October 6, 1982, at the Carbon County Courthouse in Price, Utah. The hearing was conducted by Gene Nodine, Moab District Manager. There were 53 persons in attendance and 15 gave oral comments. A verbatim transcript of the hearing was made, and is available for public inspection at the BLM offices in Price and Moab. Most comments centered on the need for cooperation between livestockmen, wildlife groups, and recreationists in the formulation and administration of a grazing program in the Price River Resource Area. Few commentors specifically addressed the proposals or adequacy of the draft statement. Specific comments are presented below.

The following people presented comments:

	Speaker	Representing
1.	Donald R. Hatch	Self
2.	Michael A. Milburn	East Carbon Wildlife Federation
3.	Harry Mangus	Carbon-Emery Fish & Game Association
4.	Lyle B. Bryner	Carbon County Farm Bureau
5.	Kim Christy	Utah Farm Bureau
6.	Dale L. Terry	Self
7.	Kent Hintze	East Carbon Wildlife Federation
8.	C. D. Butcher	Wm. Marsing Livestock Inc.
9.	Boyd Marsing	Grazing
10.	Dale Mathis	Self
11.	R. Brent Griggs	Slickrock Outdoor Society
12.	Gary Macfarlane	Utah Wilderness Association
13.	William K. Hill	Frank Liddell
14.	Lee McMulla	Self
15.	Woodrow Pilling	Self

Response to Hearing Comments

4. Lyle B. Bryner, Carbon County Farm Bureau

4.1 Comment: First of all, is livestock grazing the only factor that has contributed to range conditions in the over-all area? The Draft in some ways certainly treats it as if it were. On what basis do you adjust for climatic variations that occur throughout the time in which production data was gathered? And how have you extrapolated for this? We're aware of the severe drought that hit us in 1977. How much consideration was given here in spite of the fact that studies began in 1978?

Response: Grazing is not the only activity affecting range condition in the area. Livestock grazing has occurred on more acres in the area than any other activity and has had the largest impact on overall conditions. Also, since this is a Grazing Management Impact Statement the objective and scope is to discuss the impacts of grazing on the environment. There are climatic and phenologic adjustment factors in the SVIM allocation model. The climatic adjustment factor was determined by examining the weather records during the period 1968 through 1978. Precipitation recorded at Price, Nine Mile Canyon, Green River, and Huntington were used to establish a normal precipitation pattern. A climatic adjustment factor was derived which allowed for 10 to 15 percent more production than was actually measured in the field.

4.2 Comment: Second, does the BLM understand the ratical changes they are imposing on livestockmen regarding season of use? Four months of fall or winter grazing cannot replace the need two months of spring use. In other words, spring use is a very critical time of the year for livestockmen.

Response: See Revisions and Corrections section for Page 14 of Draft. The economic impacts of proposed season of use changes are addressed in Chapter 3 of the Draft. Loss of spring grazing was identified as a potential negative impact to rancher economics. We recognize that spring is a critical time for the full-time rancher/farmer. It must also be recognized that spring is critical for range plant growth and productivity. Both points are addressed in the Draft.

4.3 Comment: Our third point of concern stems from the matter in which the EIS boasts about the area of wide net increase in animal months expected again described in the BLM referred alternative. Well, closer examination reveals that more than half of the allotments would suffer decreases and large ones at that. To imply that these losses are made up by increasing other permitees allottments is a fallacy.

Response: There is no implication that one individual's gains will make up for another's losses. The impacts to gainers and losers is addressed for each alternative in Chapter 3 under Economics. Areawide net changes were given to benefit readers who are interested in the big picture rather than individual allotments and to provide a broad overview of the alternatives.

4.4 Comment: Fourth, how can you ethically penalize good managers who have willingly grazed below active preference levels for such a long period of time by suddenly turning their average licensed use into active preference figures?

Response: The proposal to hold operations at the last 5 years average licensed use appears in Alternative B. In this alternative, it is proposed for allotments in the M and C categories. The impacts of this alternative are addressed in Chapter 3. The four alternatives consider four different possible stocking levels including no change, for analysis purposes.

9. Boyd Marsing, Moab District Grazing Advisory Board

9.1 Comment: I see some of the recommendations that are made here today or in this here Environmental Statement that -- looking towards heavy -- well, not heavy but a high concentration, you might say, of big horn sheep. Some elk in the Elliott Mountain Price River area. That is not elk range.

Response: Your comment appears to be in response to Figure 10 on Page 50 of the Draft EIS. In this figure, the Elliot Mountain area is shown as desert bighorn sheep yearlong habitat. However, it could be confused with elk critical habitat because of the shading. The southernmost elk range is shown in Figure 50 with diagonal hash marks which represents winter range. Note also that the North San Rafael area represents desert bighorn sheep yearlong habitat and not elk critical habitat.

9.2 Comment: Climatic data is another factor that I've noticed that isn't taken into full consideration within this preference statement.

Response: While the climatic data is not fully presented in the EIS just as raw SVIM data is not presented, climatic data was considered and used. See Hearing Response 4.1.

9.3 Comment: I see some recommendation for boundary changes. These should be gone over with, as far as I'm concerned with the users involved in this regard and do it with mutual agreement, rather than a break on decisive factors.

Response: For the most part, the allotment boundary changes were proposed to make allotment boundary descriptions fit actual physical boundaries and existing grazing barriers. The text has been revised to indicate more clearly the consultation with operators before any change is made.

10. Dale Mathis, Moab District Grazing Advisory Board

10.1 Comment: On page 41 of the draft tonight there's classification of agengy: Excellent, good, fair, and poor. I think this poor is extremely overrated. I believe if you take the monitoring system, MIC, and we go out there an look at the range, we'd probably have five percent in the excellent condition and five percent in the poor condition.

Response: The classification referred to is for range condition. In the Draft this is defined as ecological condition (See Glossary), and as stated on Page 41 it does not mean forage condition or habitat condition. It is the relationship of present vegetation composition to the potential for that range site(s). If further studies were done, using this criteria, the results would be about the same. If other criteria such as forage condition, vegetation production, etc., were applied the percent of good, fair, poor may be different.

10.2 Comment: On this appendix three, in the back of the book -- just as well wrote it in Chinese for me because I can't understand it and I don't know how many can. But it mentions -- reflects back quite a few times, especially on page 123, appendix three. And I've read it several times and I still can't make heads or tails of it.

Response: Appendix 3 is quite technical. It is provided to show the mathematic formulas used in the vegetation allocation model. Under current BLM policy this model will no longer be used for forage allocation.

11. Brent Griggs, Slickrock Outdoor Society

11.1 Comment: There's a use on these lands that I don't think has been addressed tonight and frankly I don't think it's adequately addressed in the Statement. And the particulars that I mention will be directed towards wildland utilization or resources, if you will. Throughout the document, the wilderness resources are confined to areas within the Price River Resource area that are under study for wilderness. They're referred to as WSAs or lands under appeal. And the only consideration that these lands receive, and there are some 255,000 acres in just this resource area that are being considered for wilderness, the only consideration they have received is through what is called Interim Management Policy Issues. And in the document this is how management of these lands is addressed. And it simply states that this management which is designed to protect the wilderness resources in these areas, that the resources will be protected until a decision is made about them. I don't think that's adequate.

Response: Lands within WSAs have been determined to possess wilderness characteristics. Management of activities on these lands, and in areas for which the wilderness inventory decision remains the subject of an appeal, is governed by the BLM's wilderness Interim Management Policy. The policy provides national BLM guidance, is comprehensive, and is specific concerning most activities.

11.2 Comment: There is certainly not going to be 255,000 acres of wilderness in the Price Resource area; but there will be that many acres of wilderness. It may not be designated but today it is wilderness. I'm concerned that Interim Management Policy doesn't address the long-term use of these lands. In this document there are changes proposed for these areas, there are poisonings -- arial poisonings proposed for some of these areas, there are roads proposed. Probably the biggest threat to wilderness is access and new access, motorized access. And once these areas drop out of wilderness study, these kinds of activities will occur, whether it's alternative A, B, or C. And I am concerned that the Statement does not address this reality.

Response: While it is true that when an area is no longer under wilderness review, the Interim Management Policy will no longer apply, values which are identified would continue to receive consideration through the environmental assessment process. For example, primitive recreational values would continue to exist even if they are not determined to be outstanding or if the area concerned does not meet one or more of the other mandatory wilderness criteria. Recreation would be considered as a resource use together with others occurring in the area.

In addition, it is not the purpose the range EIS to address the effects of designation or nondesignation of lands as wilderness. Issues related to wilderness designation will be addressed during the wilderness EIS process.

11.3 Comment: What about the wildlands outside the WSA? What about the lands that were dropped after the initial inventory? These lands are basically roadless, they are basically wilderness. They are a part of allottments; and yet the wildland resource, the wilderness resource that's there, that is fact, is not even addressed. It's not even mentioned. And I think that's a tremendous oversight because wilderness values are a part of multiple use management. They do need to be addressed. They do have value. It is probably the fastest growing segment on public lands. And as the book points out, this is where the bucks are. There's more money coming and stands to be made to the local operators from catering to this kind of public use than there is in livestock use. It's a real economic entity and I think it deserves consideration beyond what is made in the document.

Response: Lands dropped from further wilderness consideration, up to this point, have been determined not to possess wilderness characteristics. That is not to say all natural or primitive values common to unroaded parcels of land are absent. To the extent that these values and any related socioeconomic values are affected by a proposed action, environmental analysis would address those effects on a site specific basis as each proposed action was evaluated.

11.4 Comment: On the other hand, I don't think that in some cases alternative C adequately address the concerns that I have for the wildlands that remain in this county, specifically in the Price River range.

Response: See response to hearing comment 11-3.

12. Gary Macfarlane, Utah Wilderness Association

12.1 Comment: I understand range economics. And when we do range improvements projects, we should choose our best sites, best potential sites. I would like to see something like the EIS address that a little further.

Response: The identification of potential vegetation manipulation projects in the Draft EIS was based solely on technical feasibility. Individual project planning will be done at a later date. By current BLM policy, all projects must be prioritized and subjected to a cost/benefit analysis.

Comment Letters and Responses

Letters commenting on the Draft EIS were received from the following organizations and individuals (letters listed in the order they were received):

Letter No.	Commentor	Representing
1	Melvin T. Smith	Utah Division of State History
2	J. Tom Meador	Self
3	N. Layne Miller	Indian Rock Art Research
4	Tom Behling	Cooperative Extension Service
5	W.D. Taylor	U.S. Bureau of Reclamation
6	Sharp Bryner	Carbon County Farm Bureau
7	Gary Macfarlane	Utah Wilderness Association
8	D.L. Taylor	Self
9	Verdis Barker	Self
10	Gerald T. McPhee	Sunedco Coal Company
11	Johnny Miller	Self
12	Permittees	Dripping Springs Allotment
13	Glen Jensen	Self
14	Permittees	Little Park Allotment
15	Permittees	Humbug Allotment
16	Permittees	Washboard Allotment
17	William Dale Mathis	Self
18	Richard M. Warnick	Self
19	Brent Griggs	Slickrock Outdoor Society

20	Marthe F. Dyner	Utah State Planning Coordinator
21	Kathryn Cushman	Wild Horse Organized Assistance
22	George Fasselin, Jr.	Self
23	Dave Foreman	Earth First
24	James and Sally Staker	Self
25	Pete and Steve Stamatakis	Self
26	Robert Lippman	Friends of the River
27	Steven J. Durham	U.S. Environmental Protection Agency
28	Owen Severance	Self
29	Evan R. and Linda M. Muth	Self
30	Permittees	Elmo Allotment
31	James L. Brown	Preston Nutter Ranch
32	Anthony J. Frates	Native Plant Society
33	D.L. Taylor	Moab District Grazing Advisory Board

The following section contains copies of all letters received. The line and number at the left side of the letter is a key to the comment. The response to the comment is on the right side of the letter adjacent to the identified comment. Comments and responses are numbered by letter and comment. Comment 2-1 refers to Letter Number 2, Comment Number 1. Comments that question impact analysis or data, present new information, or raise questions bearing on implementation of alternatives have been responded to. Several comments, both written and oral, expressed misunderstandings concerning how proposed seasons of use for livestock were developed and how they would be implemented. The text on page 14 of the Draft has been revised to clarify these points.

①

SCOTT M. MATHESON
GOVERNOR

STATE OF UTAH
DEPARTMENT OF COMMUNITY AND
ECONOMIC DEVELOPMENT

Division of
State History
(UTAH STATE HISTORICAL SOCIETY)

MELVIN T. SMITH, DIRECTOR
300 RIO GRANDE
SALT LAKE CITY, UTAH 84101
TELEPHONE 801/533-5755

September 9, 1982

SR/PR Rec'd. SEP 17 1982

Leon Berggren
Area Manager
Bureau of Land Management
P. O. Drawer AB
Price, Utah 84501

RE: Draft Environmental Impact Statement on Proposed Grazing Management Program in the Price River Resource Area

Dear Mr. Berggren:

1.1 Tha staff of the Utah State Historic Preservation Officer has received for review the draft EIS on Price River Grazing Management. After a review of the document, the staff concurs with the material presented, and has no major recommendations to make.

The above is provided on request as information or assistance. We make no regulatory requirement, since that responsibility rests with the federal agency official. However, if you have questions or need additional assistance, please let us know. Contact Jim Dykman at 533-7039.

Sincerely,

Melvin T. Smith

Melvin T. Smith
Director and
State Historic Preservation Officer

jr:F163/4442c

State History Board Milton C. Abrams, Chairman • Theron H. Luke • Ted J. Warner • Elizabeth Montague • Thomas G. Alexander
Dello G. Dayton • Wayne K. Hinton • Helen Z. Papanikolas • David S. Monson • Elizabeth Griffith • William D. Owens

1.1 Response: No response required.

②

J.TOM MEADOR
P.O.BOX 695
ELDORADO,TX 76936
16 SEPT. 82

BUREAU OF LAND MANAGEMENT,U.S.D.I.
MOAB DISTRICT OFFICE
P.O.BOX 970
MOAB,UTAH 84532

SR/PR Rec'd. SEP 23 1982

DEAR SIR:

IN YOUR EIS PREPARED ON THE GRAZING MANAGEMENT PROGRAM FOR THE PRICE RIVER RESOURCE AREA, YOU GAVE THE FOLLOWING ADDRESS AS A SOURCE OF A PAPER ON A LINEAR PROGRAMMING MODEL FOR VEGETATION ALLOCATION: PAGE A3-1
"DENVER SERVICE CENTER, DIVISION OF DATA BASE ADMINISTRATION, BRANCH OF USER DESIGN (D-212),DENVER, COLORADO 80225"

MY LETTER ADDRESSED TO SAME(REQUESTING A COPY OF THE PAPER) WAS RETURNED MARKED "INSUFFICIENT ADDRESS". ~~COUL~~ PLEASE INFORM ME OF THE CORRECT ADDRESS .

THANKS FOR YOUR TIME AND CONISDERATION.

SINCERELY

J. Tom Meador

J.TOM MEADOR

2.1 | P.S. YOU WILL PROBABLY NEED TO CHANGE THIS IN THE FINAL DRAFT.

ACTION MOAB INITIALS
DM
ADM
PA
P
R
C 9/22
REC'D. [illegible]

2.1 Response: The correct address has been included in the Final EIS.

③

INDIAN ROCK ART RESEARCH

Tribune Correspondent
Portrait Photography

Owned and Operated by
N. LAYNE and KAREN MILLER

P.O. Box 515 - Price, Utah 84501
Telephone (801) 637-7152

SR/PR Rec'd. SEP 2 8 1982

Gentlemen,

I would like to thank the BLM for the opportunity to express my views onthe performance of the BLM in general and the PRICE RIVER GRAZING MANAGEMENT DRAFT ENVIRONMENTAL IMPACT STATEMENT in specific.

3.1 My main concern in reading the EIS is its failure, in my opinion, to adequetely deal with the problem, and impact, the grazing programs will have on cultural resources. To be more specific: on page 18, under the heading Standard operating procedures, number 5: If a surface site is located during an inventory I do not consider i t adequate mitigation to chain around the site as was done on the Ceder Mesa chaining, leaving the site and the growth "an island" for all to see and destroy. If the island program is used in the whole chaining process, leaving natural areas, the impact is lessened but it does not adequately answer the problem. It would be my recomendation that any area found to contain cultural resources not be chained or "vegetation manipulated" until the site were excavated and the information it contained was retrieved.

I realize the expense involved here but this area has not received much attention when it comes to archaeology and there is a real void when it comes to our knowledge of the life of our prehistoric ancestors in eastern Utah.

We Record and Reproduce Indian Writings, *One of America's Natural Resources*

3.1 Response: Leaving unchained islands around archeological sites has not been considered proper mitigation by most land managers for many years. The leaving of unchained islands and sculpturing the edges of a chaining are used in mitigating visual and wildlife values.

INDIAN ROCK ART RESEARCH

Owned and Operated by
N. LAYNE and KAREN MILLER

Tribune Correspondent
Portrait Photography

P.O. Box 515 - Price, Utah 84501
Telephone (801) 637-7152

[illegible] the opportunity to enhance our knowledge [illegible] subject should not be missed. It would be a grave mistake to do otherwise.

On page 96 under the heading Cultural Resources-

3.2 The statement that "significant direct adverse impacts" are not an issue does not even address the issue of secondary impacts which in some cases can overshadow the problems of direct impacts. For instance: If more cattle are allowed in an area containing cultural resources, what impact will the increased human use have as the "cowboys" round up ther herds, and the area becomes more widely known.

14 Th say as you have that cattle grazing is an "inadvertant or indirect impact" delegates it to the realm of the unimportant. Have any studies been done to indicate the severity of the impact cattle have on cultural resources? The almost total elimination, if not severe, impact such activities have, can be seen in the Ruin Park area of Canyonlands. Years of use by the cattle industry have devestated the ruins located there...a good indication the practise should stop!

To sumup my comment on the cultural resouce portion let me say that the continuance of a practise that has had as severe an impact on the subject under dicsussion as any problem existing is fool hearty. We must not continue to destroy or harm the remains of the prhistoric

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3.2 Response: Although many claims have been made (both pro and con) on the effects of livestock grazing on cultural resources there is no known supportable information available on this subject.

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suffer under the lack of improving the grazing lands.

3.3 Another subject not adequately discussed but only mentioned on page 36, is the issue of visual resource impact. The statement is made that, "The alternatives reveal that none would measurably impact ...visual resources..". I cannot understand how anyone can say that large clumps of uprooted dead roots strewn around the countryside do not qualify as a visual impact.

One of the joys I receive from going into the back-country comes from the feeling of getting away from the evidence of man and the impacts we have made on the environment. To go into the beautiful Price River area and see the effects of chaining and other "vegetation manipulation" is very repulsive and damages the experience I receive.

Once again, let me express my appreciation for the opportunity to voice my opinions, and I do hope they will be considered and the prgrams and activities altered to protect the cultural resources present.

Sincerely,

N. Layne Miller

We Record and Reproduce Indian Writings, One of America's Natural Resources

3.3 Response: The comment is well taken and it is acknowledged that some visual impacts could occur. However the "measurability" of the impact as referred to on P. 36 of the Draft is based on the BLM visual resource management system. This system allows some alteration of areas so long as the disturbance does not exceed that allowed for the existing management class. This defines, to some extent, the "measure" of the impact. If the standard operating procedures (Item 2 and 4, P. 18 of the Draft) are applied, no significant adverse impacts would occur.

④

COOPERATIVE EXTENSION SERVICE
UTAH STATE UNIVERSITY

CARBON COUNTY OFFICE
Courthouse Phone 637-4700 Ext. 233
Price, Utah 84501

Utah State University, Utah Counties and the
U.S. Department of Agriculture Cooperating

October 12,1982

SR/PR Rec'd. OCT 13 1982

Leon E. Berggren
Price River Resource Area Manager
Bureau of Land Management
P.O. Drawer AB
Price, Utah 84501

Dear Leon,

I respectfully submit the following comments concerning the Price River Grazing Management DRAFT Environmental Impact Statement (EIS).

I know that only comments on the adequacy of this draft will be considered as it is only a DRAFT and not a decision document. Knowing that the BLM will be able to implement any portion of any alternative, restricts the comments that I may make.

4.1 In the final EIS it is possible that 85 of the 118 allotments may have season of use changes. Realizing that each allotment was studied on an individual basis and that base properties were not considered, my primary concern is the fact that the proposed season of use may be unworkable due to climatic conditions, availability of water and accessability during that period of time. No comment was made stating that it would be possible to graze those 85 allotments during that time, only that the objective was "... to maximize the production and utilization of livestock forage on public lands on a sustained yield basis," (Page 19, EIS). I agree by grazing during non-critical periods of key species growth, production of such forage would be increased, but question the utilization of such forage by livestock, if it is inaccessable.

When data for this EIS was collected, was each allotment visited, both during the present season of use and the proposed season of use, to document such grazing barriers as accessability, water availibility and/or snow cover? Were past and present precipitation levels taken into consideration in regards to the forage available?

A number of operators are dependant on Early-Spring season of use for their livestock operation as base properties are not producing sufficient feed during this time frame. So the previously mentioned proposed season of use changes could cause undo hardships on these operators.

4.1 Response: Each allotment was visited during the SVIM survey, although not necessarily during the proposed or existing season. Data gathering was scheduled to allow for accuracy of work in terms of plant species identification. Grazing barriers, both topographic and manmade were mapped as were service areas of water. Waters were also mapped by the inventory crew. In addition, each rancher was contacted and questioned about water locations and availability on their allotments. See response to Hearing Comment 4.1 for methods used to account for climatic variations.

The Utah Cooperative Extension Service, an equal opportunity employer, provides programs and services to all person regardless of race, color, national origin, sex, age, religion or handicap.

4.2 Another point that should be considered is, if the present operators are unable to use the available permits should the proposed season of use be adopted, would other operators be able to utilize the additional forage during the new season of use.

Some of the larger operators control a number of allotments for each season of use. Some of these allotments are not used each year thus lowering the average active preference. The control of additional allotments has added flexibility to these operations, this flexibility allows for better management through better utilization of available forage in drought years, pasture rotation on early spring range, and additional range when forage may be covered with snow or otherwise inaccessable. Non-use of some of these allotments allows additional forage to be used by the various species of wildlife in the Price River Resource Area (PRRA).

Most of the stockmen are sportsmen and value the wildlife in the area, but are concerned about an over abundance of wildlife and the impact that the wildlife might cause. There is ample room for both the stockman and the wildlife enthusiast and I hope that the BLM will be able to successfully work with both groups and come to a workable compromise.

Even though many of the stockmen work off farms, these farming operations are a way of life for them. This lifestyle is something that stockmen and their families value very much.

A practical educational approach should be implemented to encourage better management of both public and private lands. Such a program could be helpful to all parties involved. Through better management and mutual understanding the PRRA can be utilized and enjoyed by all the residents in the area.

My observations and concerns are based on the fact that I am a life-long resident of the Carbon/Emery Area and was raised on a cow-calf operation that utilizes BLM Early-Spring range (which is not in the PRRA). I currently serve the residents of Carbon County as an Agricultural Agent for Utah State University Extension Services.

Sincerely

Tom Behling
USU Agricultural Agent
Carbon County

4.2 Response: According to the Grazing Regulations (43 CFR Part 4100), additional forage may be allocated to any qualified applicant. By definition, all operators in the area qualify as applicants.

⑤

United States Department of the Interior
BUREAU OF RECLAMATION
UPPER COLORADO REGIONAL OFFICE
P.O. BOX 11568
SALT LAKE CITY, UTAH 84147

SR/PR Rec'd. OCT 20 1982

IN REPLY REFER TO: UC-150
120.

OCT 18 1982

Memorandum

To: Price River Resource Area Manager, Bureau of Land Management,
P. O. Drawer AB, Price, Utah 84501

From: Acting Regional Director
Bureau of Reclamation

Subject: Review of Draft Environmental Statement - Price River Grazing Management (ER 82/53)

We have reviewed the subject draft environmental statement and have the following comments to offer:

General

5.1 All of the grazing management alternatives would have some impact on salt contribution to the Colorado River because of overland flow from the Price and San Rafael Rivers' drainage. Current preliminary estimates of salt loading are 15 and 20 percent, respectively, of the total entering the Colorado River. These figures are higher than those given to the Bureau of Land Management several months ago during the consultation and coordination process.

Specific

5.2 1. On page 4, second paragraph, change "minor" to "could be significant."

5.3 2. It would be useful if the analysis of each alternative would include an estimate of salinity increases or decreases, whichever is appropriate.

5.4 3. Similarly, the economic analysis would be more thorough if it included the salinity increases or decreases to the Colorado River System.

4. Implementation of a grazing management plan will affect the salinity reduction alternatives for the Price-San Rafael Rivers Unit Salinity Investigation. The Bureau of Land Management and the Bureau of Reclamation should coordinate closely to account for these impacts.

We appreciate the opportunity to review this draft environmental statement.

W.D. Taylor

5.1 Response: The text has been changed on PP. 4 and 57 to reflect this new information.

5.2 Response: The text on Page 4 has been changed.

5.3 Response: Jim Riley of the Bureau of Reclamation (BOR), Provo Projects Office was called for information. He stated that if BLM had some estimates of sediment yield for each alternative, BOR could provide information to interpret the figures in terms of salt contribution. We do not have the sediment yield information available, except for some rough estimates of current yields.

5.4 Response: Since we cannot quantify changes in salinity input under the various alternatives, we cannot conclude an economic analysis of salinity based benefits. We can, however, provide an estimate of the absolute maximum benefit which could be derived, using the following assumptions: First, all of the salt loading in the EIS area occurs in the Price River system. Second, measurements made at the USGS gauging station at Woodside accurately represent the amount of salt and water discharged into the Green River. Third, the estimate of the contribution of overland flow to Price River salinity (21 percent) accurately represents the contribution from BLM lands. The final assumption is that runoff from public rangelands in the Price River system is 15 percent of the total.

The Woodside gauge indicates that an average of 265,400 tons of salt are carried by 84,000 acre-feet of water, annually. From assumptions three and four, the contributions from BLM lands would be 55,734 tons of salt and 12,600 acre-feet of water. If none of this salt entered a perennial water course, while all of the water still ran off, the change in salt concentration of the Colorado River at Imperial Dam would be a decrease of 5.25 mg/l. This would represent a benefit to downstream users of $2,693,250.

If the water did not run off, the salinity decrease would be 3.70 mg/l, and the monetary benefit would be $1,898,100.

The 1982 figures were calculated at $513,000 per mg/l. These figures were determined by BOR, who also provided the equations for calculating the downstream contribution to salinity of projects located upstream.

Please note that there may be some problems with the assumptions. First, most, but not all, of the salt loading occurs in the Price River system. All streams have some contribution to salinity. Second, there is salt loading occurring downstream from the gauge at Woodside. Third, private, state, and Forest Service lands also contribute in varying degrees to salinity and the 21 percent figure derived by CH_2M Hill of Boise, Idaho under BOR contract may not be accurate. Finally, the 15 percent runoff figure is only an estimate based on rainfall-water yield information and is very rough.

⑥

CARBON COUNTY FARM BUREAU

SR/PR Rec'd. OCT 21 1982

October 13, 1982

Leon E. Berggren
Price River Resource Area Manager
Bureau of Land Management
P.O. Drawer AB
Price, UT 84501

Dear Mr. Berggren:

The Carbon County Farm Bureau represents more than 185 member families, comprising the majority of the farmers and ranchers in Carbon County. We appreciate this opportunity to address some major concerns that we see regarding the Draft EIS on the Price River Resource Area.

6.1 We question that livestock grazing is the only factor that has contributed to range conditions in the overall area, yet your draft certainly treats it as though it were. We believe the Draft to be inadequate in adjusting for climatic variations that occurred throughout the time period in which production data was gathered. The 1977-78 year was ~~a-year~~ of severe drought throughout most of Utah.

6.1 Response: See Hearing Comment Response 4.1.

To illustrate our point, I would like to relate an experience that happened in 1961 to a grazing association of which my brother and I were members. That year BLM imposed drastic permanent cuts on our spring grazing allotment. The rationale for the cuts were claims of successive overgrazing that had allegedly reduced the allotment's carrying capacity. You may recall, however, that most western ranges suffered that year due to severe drought conditions, which we believe had nothing to do with overgrazing. An arrangement was made not long after between the state and BLM on an ownership transfer that included this allotment and some school sections. Following the transfer the state allowed permittees their original stocking rates. Due to more precipitation, this allotment was reportedly in better condition this spring than it has been in many years.

6.2 Another concern we have is that the proposals of the draft EIS impose some very radical changes on livestockmen operating on BLM administered ranges. It simply is not reasonable to expect that the forfeiture of two months of spring use can be replaced by four months of fall or winter grazing. The livestock feeding cycle, as you will recognize, cannot accommodate gaps in range availability. That kind of flexibility is not available in most livestock operations.

6.2 Response: See Hearing Comment Response 4.2.

We do not question that these ranges are in a delicate state throughout the early spring. However, completely removing cattle and sheep during these spring months is simply not practical. Alternative "B", the BLM planning recommendation, suggests that all allotments supporting a perennial stream would be limited to fall grazing only. This illustrates the kind of inflexibility livestockmen cannot tolerate.

6.3 The BLM planning recommendation in the EIS boasts that there will be area wide net increases in animal months expected. Closer examination reveals that more than half of the allotments would suffer decreases; many of those being substantial decreases. Increasing one allotment at the expense of another does nothing to preserve the integrity of the operation being decreased. Practical experience would indicate that some permittees would never be able to fill the increased allotments due to other limiting factors, while those who have suffered substantial decreases may be forced out of business. For these and other reasons we believe the EIS is unrealistic in evaluating the economic and social impacts on Carbon County and its livestock producers.

6.4 We fully support a program by the Bureau of Land Management to stock and monitor ranges, but we absolutely cannot support a program that penalizes good managers who have willingly grazed below active preference levels for such a long time, by now turning their average licensed use into active preference figures. We strongly urge you to implement a stock and monitor program but to begin it with the current active preference level and then monitor and adjust according to the trends established over a period of years.

We thank you for this opportunity to comment on this Draft EIS. We respectfully request your favorable consideration for the concerns we have expressed. We further pledge our support to assist you in developing an environmental impact statement which accurately reflects the range condition and which will, in the long run, benefit both permittees and the Bureau, as we cooperatively manage this valuable, renewable, range resource.

Sincerely,

Sharp Bryner
President

Sharp Bryner

6.3 Response: See Hearing Comment Response 4.3.

6.4 Response: See Hearing Comment Response 4.4.

⑦

Utah Wilderness Association

325 JUDGE BUILDING·SALT LAKE CITY,UTAH 84111·(801)359-1337

October 22, 1982

SR/PR Rec'd. OCT 25 1982

Mr. Leon E. Berggren
Price River Resource Area Manager
Bureau of Land Management
P. O. Drawer AB
Price, Utah 84501

Dear Leon:

We are writing on the Price River Grazing Management draft EIS. Please include these comments in the official record.

These comments will address two general areas of concern. The first deals with the general approach of the EIS. The second is more site specific in nature.

The alternatives addressed in the EIS are a disappointment. They are the same alternatives in every Utah EIS. This "canned" approach is inflexible and unrealistic. We have been willing, and are always willing, to work with the BLM to develop an alternative or alternatives that meet a variety of concerns.

7.1 A major problem with the alternatives is the apparent lack of effort to achieve a consensus. Wildlife, wilderness, and livestock are very seldom incompatible. Alternative B sounds as if all uses and interests must give in to achieve a true multiple use philosophy. This perception is inaccurate. Wilderness, wildlife, and livestock need not mutually suffer and compromise to achieve multiple use goals. Livestock range improvement projects can and should be located outside of areas of concern for wilderness and wildlife. In fact, the areas best suited for intensive livestock and range management are not the same areas of concern for wilderness and wildlife. Why can't the BLM propose an alternative that would meet all these concerns? It is very likely this type of alternative would be better for all involved. The impairing range improvement projects would take place in non-pristine areas. These areas have easier access, making them more economical. This would save taxpayers' money.

Essentially what we are suggesting is an alternative that is tailor-made for the Price River Resource Area. This type of alternative should be able to incorporate the concerns of various people with a minimum of conflict.

7.2 There are several substantive and specific questions the EIS has raised. These should be addressed. Both alternative A and B have proposed range improvement projects in present WSA's and appealed units. It would be better to eliminate any range improvement projects from the WSA's and appealed units. Generally, areas already of a non-pristine nature are better for a positive economic return on range improvements. The remoteness of the WSA's and appealed units would

7.1 Response: Improvement projects identified are largely based on the biological suitability of an area for developments which would improve forage productivity. Both economic cost/benefit and the details of possible resource conflicts resulting from a project are better addressed on a site specific basis as each individual project is proposed. Most types of vegetation manipulation and certain types of range improvements would not be permitted in areas subject to the wilderness Interim Management Policy.

7.2 Response: Lands proposed for range improvement projects in Alternatives A and B were selected because of terrain, reclamation potential, precipitation, vegetative cover and distribution. No surface disturbing range improvement projects would be allowed in any designated WSA or appealed area. Following a decision by Congress, the areas not designated as wilderness would revert to full multiple use management. However, as stated in the Draft (P. 18, Item 2), a site specific environmental analysis (EA) would be completed on each project. This analysis would include impacts to wilderness values, cost-benefit analysis, etc., and the decision maker would then be better able to evaluate the desirability of the proposed project.

increase the costs of the range improvement projects. It would benefit ranchers, wilderness advocates, and the taxpayers to eliminate these large-scale range projects from the areas under IMP. In any case, the acreage involved in these areas is small compared to the size of the resource area.

We object to any impairing range improvement projects in any WSA, appealed unit, in the roadless area Wildcat Canyon (between Spring Canyon and Consumer Wash), or in the Price River area north of Cedar Mountain around Humbug Wash and Sulphur Canyon. These areas are an important roadless resource. Also, the WSA's and appealed units should go through the wilderness study process before committing them to other resource uses. Recommending any portion of them for impairing range improvements would bias the wilderness study against wilderness. The wilderness study process should be the forum for wilderness suitability decisions, not a grazing EIS.

7.3 The impacts to wilderness should have been more carefully analyzed. As mentioned before, both alternatives A and B have proposed range projects of an impairing nature within WSA's and appealed units. The EIS states that these areas will be managed under IMP. Although this is true, portions of all of these areas may be released by Congress in the future. These projects then would be allowed to take place. The EIS should analyze the impacts to the wilderness qualities of the WSA's and appealed units even though the IMP is in place. The areas presently under IMP are not the only roadless areas in the Price River Resource Area. Wildcat Canyon and the Price River Area in and around Humbug Wash possess important backcountry characteristics. The EIS should examine the impact to these areas.

Alternative C should be implemented for the areas of concern we have listed. We recognize the potential hardship to ranchers if alternative C were implemented across the entire resource area and recommend that an alternative be designed to allow needed range improvement projects outside of the areas we have mentioned. The river recreation industry is critical in this area. The region surrounding the Green River is also critical wildlife habitat. In fact, the Book Cliff / Green River region is some of Utah's finest big game habitat. The riparian areas should be protected from abuse by livestock. Recreation livestock conflicts could be minimized by transferring livestock use in critical riparian zones and river corridors to other areas.

We are not insensitive to the needs of the livestock industry. Our letter and oral comment in Price have proven this. However, it must be remembered that the public lands belong to all Americans and that the hunting and recreation industry in this resource area are of utmost importance. The Desolation Canyon WSA is the largest, and perhaps the finest, BLM wilderness in Utah. These overriding concerns must be considered when making a final decision as a result of this EIS.

Thanks very much. We appreciate the opportunity to comment.

Cordially,

Gary Macfarlane

Gary Macfarlane

cc: Brent Griggs
Johanna Wald

7.3 Response: See response to Hearing Comment Number 11.2.

Moab, Utah
Oct 22, 1982

⑧

Leon Berggren
Area Manager

SR/PR Rec'd. OCT 26 1982

Dear Leon,

I have read the Draft EIS for Price River and would like to express some concerns. It appears you intend to make further cuts in livestock use while making substantial increases in wildlife.

8.1 While alternatives A + B show some small over-all grazing increases, over half of the operators are scheduled for cuts. (45 of 73) The sheep situation is even more ridiculous: with only 10% of the preference being used, you advocate cutting 60% of the operators 95% ! and giving the forage to the deer

8.1 Response: See Hearing Comment Response 4.3.

I am appelled that during economic hard times such as we have today that you can consider making drastic cuts in an industry that supports our economy and make large increases in recreation. If many more people get out of work we won't need and recreation.

8.2 While I am on recreation I feel your economic data has over-stated benifits of hunting and boating. These are active for only a short season and I doubt if it yeilds the benifits shown. Recreation and hunting also pays no fees for the use of these lands. While B.L.M. contends that grazing fees are too low,

8.2 Response: The methodology for calculating the contribution of hunting and boating activities in the area is shown in Appendix 7 of the Draft. The figures derived are considered to be conservative because of the values used per visitor day. The figures used for hunting were $20.83 per day for big game hunting and $8.10 per day for small game hunting. Figures derived for the same activities in other areas range from $10 to $110 per day (Martin et. al., 1974; Brown et. al., 1973; Hansen, 1977; McKean, 1979; and UDWR, 1977). The contribution of boating on the Green River is also conservative when you consider that there are over 30,000 passenger days spent annually and some operators charge up to $100 daily per passenger. This is an addition to other local expenditures.

A change in sales taking place during the boating or hunting season would have a different impact than the same change taking place over an entire year. The regional modeling would not account for this difference; however, it is likely that only the estimates of employment would be affected.

at least livestock do pay a fee for the forage they consume.

8.3 The report repeatidly stresses the unfavorable impacts of livestock grazing. It makes no mention of similar impacts of game species.

You surly realize that you have no control of where or when game graze and only limited control of numbers.

I feel this statement is definity slanted against livestock and favors game animals. It reflects the bias of the team leader with 10 years as a game manager.

D.L. Taylor
Chairman, Grazing
Advisory Board

8.3 Response: Wildlife grazing ungulates can and do negatively impact habitats. The impacts of mule deer, combined with livestock, on ranges and the need for deer herd reductions on some units was discussed on PP. 86, 105, 106, 118, and 130 of the Draft. Impacts of elk and the need for herd reduction was discussed on PP. 88 and 108.

⑨

October 27, 1982
Verdis Barker
RT. 1 box 270
Price, Utah 84501

United States
Department of the Interior
Bureau of Land Management

To Whom It May Concern

9.1 In regard to the Clark Valley Permits, If you take away the spring use I won't have anyplace to put my cows, except in the corral. I would have to build more corral's. Also I would have to buy hay to feed the cows and I don't have money to do either .

The reason the winter permits are not feasiable, is because thier isn't water during that time of the year. the ponds are frozen solid around the first of the year. In the spring we have run off water from the higher mountains for the cows.

We have a divided pasture, and if it hasn't worked it's because while our cows are on one side of the permit, the neighbors cows are on the other side. I really think it has worked, when our cows come out of Clarks Valley they are rolling fat. So it looks to me like thier is plenty of feed for the cow's and also the antelope.

The Wellington Cattleman has private owned ground, and also a section of State land leased. The antelope run on us just as much as they do on federal property and were not complaining.

Clarks Valley is a desert and as long as we don't have rain thier is no way the feed can grow.

The cows do eat alot of greecewood.during the spring.

Yours Truly

9.1 Response: See Hearing Comment Response 4.2.

(10)

SUNEDCO COAL CO.
7401 W Mansfield Ave
Suite 418
Post Office Box 35B
Lakewood CO 80235
303 989 9280

October 26, 1982

SR/PR Rec'd. OCT 28 1982

Mr. Leon Berggren, Area Manager
Bureau of Land Management
P.O. Drawer AB
Price, Utah 84501

Dear Mr. Berggren:

We have received a copy of the Price River Grazing Management Draft EIS. Because we are planning to develop a mining operation in the Soldier Canyon area, the grazing management plans are of particular interest to Sunedco. Our proposed mine and load out facilities are located in Township 13 South, Range 13 East. At full production we are planning to ship approximately 5MM tons of coal from this mine.

It is stated at the beginning of Chapters 2 and 3 that minerals will not be impacted by the proposed BLM actions. Although minerals per se will not be impacted, these actions could indirectly impact or complicate the minerals extraction process that Sunedco has planned for the Soldier Canyon grazing allotment and portions of several other adjacent allotments. Some of the potential complications that the proposed vegetation manipulations could produce include: (a) concentrating big game animals in areas of potential conflict, (b) altering patterns of big game movements in such a way that mitigation measures currently planned could be significantly affected, and (c) confounding the assessment of mining impacts on mule deer numbers and movements.

More specifically, the clearing of areas along Soldier Creek and Dugout Creek Roads may concentrate mule deer adjacent to roads where large truck traffic is already heavy and/or is scheduled to increase, thereby greatly increasing the potential for vehicle-killed dear.

We have formulated game management and mitigation measures for our proposed facility, based on recent studies of mule deer movement patterns. If proposed BLM manipulation of vegetation alters existing patterns of deer movements, these management plans would be significantly affected. This in turn would require new studies, reassessment, and readjustment of Sunedco's management program.

U.S. GEOLOGICAL SURVEY
MENLO PARK
FEB 9 - 1983
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The simultaneous, or closely associated, impacts of the BLM vegetation treatments and development of a new mine will create a double impact situation that will make it difficult to determine cause for any changes in mule deer numbers and movements that may result.

10.1 The overall impact of BLM's proposed manipulation of vegetation on the Soldier Canyon allotment could be totally beneficial to both mule deer and Sunedco's planned mining operations. For this reason, Sunedco requests the cooperations of BLM in coordinating and integrating the management needs and goals of the coal extraction process into their overall land management plan on the Soldier Canyon grazing allotment. Specifically, Sunedco requests that the designated areas along Soldier Canyon Road and Dugout Canyon Road be moved to accommodate our concern. They could be moved north and/or east of our facilities and still have minimal impact on our project and on the BLM's wildlife management plans.

We appreciate the opportunity to comment on this plan and commend you and your staff for a thorough analysis.

Very truly yours,

SUNEDCO COAL CO.

Gerald T. McPhee

Gerald T. McPhee
Manager, Permitting & Environmental Compliance

GTM:mdn

10.1 Response: See Hearing Response 12.1. Your comment is noted and coordination with your company will be initiated should any projects in this area be actually implemented.

10-29-82

SB/PR Rec'd. OCT 29 1982

⑪

Comments Concerning Price River Grazing Management
Draft Environmental Impact Statement

The new proposed season concerning the Soldier Canyon allotment from 6-1 to 2-28 cannot work for us. Reasons being, from 6-15 to 10-15 we graze on high private summer range. In other words there is no use for this allotment in the summer months.

11.1 Our main use on this allotment for the existing season was from 11-16 to 6-15, which varies with exchange use.

The least amount of use on these allotments is during the fall and winter months, because of private pasture in the fall and during heavy winters feeding alfalfa is necessary.

Our need for the spring use is necessary because we do not have pastures, or feed hay during spring grazing.

These are the reasons we are opposed to your EIS proposed season.

Our individual management plans are as follows.

11.1 Response: See Hearing Comment Response 4.2.

We have a north and a south pasture, which we alternate for use.

11.2 In order to have a better alternative, since we would fall into the "I" category of your new proposal, it would be feasible to fence Soldier Canyon allotment along both sides of the highway dividing it into four pastures. Then a management plan could be made as far as alternate use on fall, winter and spring use. This way we could coincide with the wildlife and livestock complications you have stated in the EIS.

Signed

Johnny Miller

11.2 Response: Specific grazing systems were not proposed in the Draft (see P. 11). Consultation with operators would occur prior to any changes. See text changes for P. 14 of the Draft.

SR/PR Rec'd. OCT 29 1982 ⑫

October 24, 1982

Bureau of Land Management
P.O. DRAWER AB
Price, UT 84501

To whom it may concern:

We, the permittees of the Dripping Spring Cattle Allotment, would like to make a written comment of the Price River Grazing Management Draft Environmental Impact Statement.

We, the permittees in the Dripping Spring Allotment, are not in favor of Alternative B. In the past, this allotment was used partly for Winter use and was not feasible because all water freezes up and the livestock are unable to get a drink. After the ground is frozen, due to the rocks, the cattle cannot move around because it is too hard on there feet.

12.1 Dripping Spring does not have ample Winter brush for Winter feed. If we get eight inches of snow, it would all be covered; and the livestock could not stay because of lack of feed.

This is a big allotment; and with the water improvements we've made so far to distribute the cattle, we feel that we are not hurting the Range for Spring use. We have spent private funds to enhance the Spring operation.

Each livestock operater would like to be involved and informed on the Monitoring System before a final decision is made.

There are six permittees depending on this operation, and any change at all would effect their livelihood.

Aron Hansen Elmo. ut.
David Hansen Elmo. ut.
Darold G Hansen
Marvin Hansen & Glen Hansen
Alvin Jensen
Lee McMullin
Glen Jensen Elmo, Utah

12.1 Response: The text has been changed on P. 14 of the Draft to indicate consultation with operators prior to any changes.

SR/PR Rec'd. OCT 29 1982 ⑬

October 24, 1982

Bureau of Land Management
P.O. DRAWER AB
Price, UT 84501

To whom it may concern:

I, the permittee of the Sage Flat Allotment, would like to make a written comment on the Price River Grazing Management Draft Environmental Impact Statement.

I protest putting the Sage Flat Allotment into all Winter Range.

In the Winter, cattle will not cross the ice without being forced across.

Cattle have to be moved from one area to another; some areas would be grazed heavy, and the smaller areas would not be grazed at all. Some of these areas are too small to put cattle on for over a day. 13.1

In the Spring and Fall, the cattle can graze everything in this allotment. I would like to continue using this allotment the way I have in the past. Gary Hansen of the Bureau of Land Management suggested I use it this way because it was the best way to fit into my operation. Using this allotment in this way has not hurt the forage or endangered the wild life.

I would also like to be involved and informed on any Monitoring System before any final decision is made.

Glen Jensen

13.1 Response: See response to comment 12.1.

SR/PR Rec'd. OCT 25 1982 (14)

October 24, 1982

Bureau of Land Management
P.O. DRAWER AB
Price, UT 84501

To whom it may concern:

We, the permittees of the Little Park Allotment, would like to make a written comment of the Price River Grazing Management Draft Environmental Impact Statement.

In the book, page 28, table 6, Alternative B suggests Little Park be used from May 1 to August 30. We protest losing our late Summer and early Fall use out of the Little Park Allotment.

14.1 We cannot use the lower end of Little Park until late Summer because of water and bugs. We seldom ever get water in our ponds until late Summer; therefore, our cattle would be grazing on the deer Winter range about all the time.

Little Park Allotment has approximately 20,040 acres of land with only about 240 A.U.M.'s. A lot of this area does not get used because of lack of water. We would like to go with a grazing plan to develop water. We would like to develop more ponds and would be willing to use advisery funds as well as personal funds.

We, the permittees, would like to be involved and informed on any Monitoring System before a final decision is made.

We feel that changing the allotment from May 1 to August 30 would jeopardize a family operation that has been going on for many years.

Edwin C. Jensen - Elmo, Ut
Alvin Jensen Elmo Ut
Glen Jensen Elmo, Utah

14.1 Response: See response to comment 12.1. Under current policy, the BLM encourages livestock operator investments in range improvements.

SR/PR Rec'd. OCT 29 1982 ⑮

October 23, 1982

Bureau of Land Management
P.O. DRAWER AB
Price, UT 84501

To whom it may concern:

We, the Humbug Cattle Association, would like to make a written comment on the Price River Grazing Management Draft Environmental Impact Statement.

15.1 In reference to page 11, there is no mention to water. In order to have an effective grazing system, we need water to help with distribution of livestock. Most of Humbug is suitable to grazing. The Humbug Association feels that the forage is adequate, and we would like to implement a grazing plan that would develop water. The only distribution of water right now is snow. The association would like to develop ponds with the help of advisery funds as well as personal funds. We feel that we have not had any support at all from the Bureau of Land Management on developing any water.

15.2 We also feel that we should have a Monitoring System and feel that the association should be totally involved with the system. Each member would be willing at any time to ride with anyone to do the monitoring. Each livestock operatior would like to be totally informed on the Monitoring System. So far, all of the monitoring has been from the windshield. We do not feel that this is a good over all survey.

15.3 We feel the Humbug Allotment has no wildlife conflicts. At the present time, there is no operator that is doing anything to endanger wildlife. Humbug is an open terrain, and is not a wildlife habitate. What few deer there are have migrated from the adjoining mountains. Antelope was put into the Icelander Allotment, which ajoins the Humbug Allotment, during the 70's. As of now, there are still no antelope in the Humbug Allotment. We favor the multible use concept.

Most Humbug operators are two or three generation livestock operators. Humbug has been a mainstay since pioneer days; any change would effect the livelihood of the present operators.

15.1 Response: See response to comment 11.2. Water developments were included as "other range improvements" on P. 11. They would be designed during AMP development for your allotment.

15.2 Response: See Revision and Correction section for text change on P. 14. Livestock operators have been invited to participate in range surveys. Prior to the start of the SVIM survey, all the operators were contacted by mail and invited to a SVIM orientation meeting. There was negative response to this invitation. The SVIM survey was not a "windshield" survey. The field data including transect locations are available for review in the Price BLM Office.

15.3 Response: Humbug Allotment is recognized as yearlong antelope and yearlong mule deer habitat, as indicated in Figure 11, P. 51. Present population estimates for these species for Humbug Allotment are 33 antelope and 61 mule deer (see Appendix 6, P. A6-3). A potential to support 20 antelope in Humbug is also recognized. Livestock grazing during early spring (March 15 through June 1) is a recognized conflict. During this period livestock are utilizing forbs which the antelope rely on during the spring, summer and fall. Livestock on Humbug Allotment are presently grazed during a portion of the spring period.

With adequate water developments, we feel that there is ample forage for the livestock until late Spring.

15.4 Before there is any final decision made, each permittee would like to be consulted and would like to be able to voice their opinions.

Wm Dal Mathis	Price Utah
Glen Jensen	Elmo Utah
Edwin C. Jensen	Elmo, Utah
Lee McMullin	Cleveland Ut
Grant Oliver	Wellington
Alfred Oliver	Elmo Utah
John Oliver	Lawrence Utah
Doyle Allred	Cleveland Ut.
Kenneth Oliver	Highland, Ut.
Jimmy Allred	Cleveland Ut

15.4 Response: See text change for P. 14 in Revisions and Corrections section.

Cleveland, U
Oct. 27, 198 ⑯

SR/PR Rec'd. OCT 29 1982

To The Bureau Of Land Management
United States Government:

We, the permitees on the Washboard grazing area recommend that you designate grazing use in the Washboard area as SPRING USE. This will not be a change from previously designated use.

Permitees feel that spring use is generally more beneficial for them because it relieves their farms in the Spring for farming. Also giving the farmer more time at a crucial time to begin work on farming.

16.1 There is a definite conflict with our operations in farming or ranching if grazing on the Washboard unit were to be changed to spring.

Generally, in the Washboard area, more feed is available for cattle in the Spring than in other time periods; also, more water is available.

Snow is a factor, snow is deep in some areas and does not melt as it does in other areas to make use practical.

For many of us, use of the Washboard area in the Spring coordinates with other area of use such as forest and others.

16.2 If you survey plant use in this area the permitee operators request that they have an opportunity to be in attendance and have input to make suggestions or recommendations. We protest a windshield survey.

We do not believe that any use by cattle has done or does now conflict with any other use such as wildlife or recreation use.

We appreciate your concern:
Permitees of Washboard Area

M. James Atwood
Jimmy T Allred
William R Allred
Orson L Marsing
C. Duane Jensen

16.1 Response: See response to Hearing Comment 4.2.

16.2 Response: See response to comment 15.2.

William Dale Mathis ⑰
Sunnyside Star Route
Price, Utah 84501

SR/PR Rec'd. OCT 29 1982

Leon E. Bergren
Price River Resource Area Manager
Bureau of Land Management
Price, Utah 84501

Dear Mr. Berggren,

I am writing this letter concerning the Price River Grazing Management Draft Environmental Impact Statement.

17.1 I propose that each of the 118 allotments, should be addressed individually and alternatives or combinations of alternatives be explained to each operator individually.

Referring to page 10, concerning the list of preparers, I wish to make this observation, that each of these preparers have no listing of experience with livestock operations, yet they are the ones that issue forth the alternatives of grazing management. Also none of the preparers have not lived over 3 years in the Price River Resource Area.

17.2 On page 11, all 8 treatments are for forage, while none deals with water development, hence not a total grazing system. Based upon years of personal experience, most places in the Price River Resource Area, have ample forage, but lack critical water developments. Water conditions help range conditions, livestock operators, and wildlife.

17.3 On page 41, the poor range conditions of 28% is far too high and is similiar to the conditions of the 1977 drought. Based upon my personal contact with several allotments while operating my livestock operations, I see good conditions.

I hope that the SVIM inventory that was taken in 1977 (severe drought for Price River Resource Area) will not be the baseline for trend monitering to begin, as this was a most unusual year.

17.1 Response: Allotments were addressed individually in terms of season of use, allocation, boundary changes, livestock restrictions and resource conflicts. To simplify the document, similar allotments were grouped where possible. Individual allotment planning (AMP) will take place after the EIS.

17.2 Response: The treatments discussed on P. 11 are strictly grazing treatments designed to have an impact on the vegetation. An allotment management plan includes a grazing system and projects needed such as water developments and fences to make the system work. Problems of water distribution are recognized on P. 57 of the Draft.

17.3 Response: Range condition in this document refers to ecological condition (see P. 41 of the Draft). While the 1977 drought did have an effect on the production of forage it did not impact ecological condition. Condition is determined by community structure, the presence or absence of plant species, age, and form class distribution, etc. Drought has been a common occurrence in this area for the last 10,000 years. There is no evidence to show past droughts having affected the structure of a plant community. Drought is not a recent occurrence and plants have adapted to it. See text changes in Monitoring Section (P. 14, 16).

17.4 On page 47, the active preference of 45,076 for cattle and 40,955 for sheep are workable preferences and are the figures that should be used.

17.5 Referring to the allotment management plans on page 47, "rancher desires" have been "broken" ..."because needed projects have not been constructed." Most ranchers signed a AMP with a hope for a workable and useable grazing system, only to find out that they had seedings, but no water, and had paperwork that did not develop into reality.

17.6 Also on page 47, the BLM recognizes four suitability criteria, but does not offer ways of improving the land to make it more suitable. The Impact Statement, I feel should definitely deal with ways to improve the useability of the land, at least the water for sure, since it is most critical for livestock operations.

17.7 On page 57, the reason for the inefficiency of some of the diverting works is because of poor BLM engineering design. For example, Poison Spring, the pipeline holding tank built in 1982 by BLM, collapsed in 1982.

I acquired my first grazing privileges in 1968, and I have been totally involved in livestock operations ever since. I have the Humbug permit for winter and early spring, the Mathis Wash permit for winter use, the Oviatt permit for fall and winter use, the Coalcreek permit for spring use, and the Willowcreek permit for summer use. I have acquired these permits for a year round operation. At present time, I have a workable and profitable operation, but any change of seasons would seriously disrupt my year round operations.

I have been on the Moab advisory board since 1979, and the Price River soil conservation board since 1974, and I have been a farmer and rancher all my life.

17.4 Response: See response to Hearing Comment 4.4.

17.5 Response: Page 47 of the Draft states most of the AMPs in the area have not been fully implemented because needed projects including facilities and water have not been constructed. It also states that grazing rotation sequences have been broken due to weather, forage conditions, and rancher desires. Project construction is subject to budget constraints. Many times, activity plans are not implemented due to lack of funding. This is a problem that we anticipate will continue.

17.6 Response: See PP. 11, 12, and 16 of the Draft. While the Bureau is aware of water distribution problems, specific projects are not proposed in the EIS. Specific range improvement projects and the application of suitability criteria other than slope, will be considered in individual allotment management plans.

17.7 Response: The purpose of the statement on Page 57 was to indicate the problems of water supply for livestock and wildlife in the area. There are a variety of reasons for the water distribution problems including poor design, lack of maintenance, etc. No attempt was made to lay blame for these deficiencies.

17.8 Therefore, I wish to be totally involved in the range monitering and all management framework and all planning and decision making. I would be willing to spend private funds for range improvements and water developments.

Sincerely yours,

Wm Dal Mathis

William Dale Mathis

17.8 Response: See response to comments 12.1 and 14.1.

⑱

SR/PR Rec'd. OCT 29 1982

Richard M. Warnick
P.O. Box 374
Monticello, Utah 84535

28 October 1982

Leon Berggren
Price River Resource Area Manager
Bureau of Land Management
P.O. Drawer AB
Price, Utah 84501

SUBJECT: Desolation Canyon WSA and Appealed Area

Mr. Berggren:

I am one of the millions of Americans who have never been on a river trip in Desolation Canyon, and who have never hiked in the areas now being studied for wilderness. However, I am definitely going to get there one of these days, and when I do I will be plenty angry if the BLM has not protected the wilderness qualities of the area in the meantime, qualities recorded by Major Powell in the reports of his explorations.

18.1 The Grazing EIS recently released by your office contemplates, as a preferred alternative, (Alternative B) large and impairing range projects within WSA and Appealed Area boundaries. In particular, Wildcat Canyon, Sulphur Canyon, Humbug Wash and the north end of Cedar Mountain are being threatened with "improvement." If the EIS made a better analysis of the impacts of these projects on wilderness qualities, I believe that there would have to be a change of priorities concerning the Desolation Canyon area.

The BLM alternatives presenting in this grazing EIS are not realistic and appear to have been presented only to add credence to the preferred (by grazing interests) course of action. A balance should be struck among the combined concerns of wildlife, wilderness and livestock. While the wilderness study is still ongoing, Alternative C should be implemented on WSA's, Appealed Areas, and the four other critical areas mentioned in the preceding paragraph.

I would like you to include this letter in the official EIS record. Thanks for this opportunity to comment.

Sincerely,

Richard M. Warnick

Richard M. Warnick

18.1 Response: While Desolation Canyon is in a WSA, the particular areas referenced are within a wilderness intensive inventory unit which did not become a WSA and is not the subject of an appeal. See also responses to Hearing Comments 11.1 and 11.3.

⑲

SR/PR Rec'd. NOV 01 1982

SLICKROCK OUTDOOR SOCIETY
PRICE, UTAH

Mr. Leon E. Berggren
Price River Resource Area Manager
Bureau of Land Management
P. O. Drawer A B
Price, Utah 84501

Dear Leon:

The following comments relate to the price River Grazing Management Draft EIS. It is a more detailed supplement to public comments made in October 1982 at public hearings in Price, Utah. We ask that this response be included in the official record.

19.1 Our concern is that the document mentioned above almost totally neglects wilderness resources present on P.R.R.A. lands except supplemental wilderness values such as wildlife and cultural resources. Particularly lacking is any mention or recognition of wilderness values known to exist outside established wilderness study areas. These wild land values have been identified and documented during the wilderness review process. The membership of this organization feel very strony that these resources must be identified in this document and the impact of possible action under each alternative be evaluated and presented.

19.1 Response: See response to Hearing Comment 11.3.

19.2 We are particularly opposed to any vegetation manipulation projects or development requiring new road construction or other surface disturbance in the North Cedar Mountain area; specifically the area along the Price River from Cottonwood Wash to Camel Wash and south-east along the forks of Summerville Wash. Likewise, we are opposed to proposals under alternative A & B to chain areas in Wildcat and Cold Spring Canyons. Obviously, we are opposed to any actions on WSA's or appealed lands that would not be permitted in established wilderness areas.

19.2 Response: See response to Hearing Comment 11.3.

It is safe to assume that not all WSA's or appealed lands within the P.R.R.A. will become designated wilderness. It is imperative that the wilderness resources documented as existing on these lands receive management consideration and protection, once they return to less restrictive management. 19.3 We feel the EIS is deficient for not addressing the issue of assessing impacts on wilderness resources on lands released from wilderness study.

19.3 Response: See response to Hearing Comment 11.3.

This organization does not specifically support any of the alternatives presented in the EIS. We could support most proposals presented in alternative B except those involving surface disturbance in the areas mentioned previously. We do not support continuing grazing in the Greenriver corridor and favor alternative C in that regard. The reduced stocking rates for livestock and season of use changes proposed in alternative C for riparian habitat, more closely approaches the management need for improved long term production in these critical habitats.

In summary then, we feel this document is deficient for failing to adequately identify, describe and estimate impacts on wilderness resources within the P.R.R.A for any of the alternatives. Addionally, we have indicated support for specific recommendations developed in alternative C. With these changes, the majority of our membership could support proposed managment objectives presented in alternative B, so long as the present quality of wilderness values with the P.R.R.A. are maintained.

Thank you for an opportunity to respond to the EIS

Sincerely,

Brent Griggs

Brent Griggs, President
Slickrock Outdoor Society

SR/PR Rec'd. NOV 01 1982

(20)

1896

STATE OF UTAH
OFFICE OF THE STATE PLANNING COORDINATOR

SCOTT M. MATHESON,
GOVERNOR

MARTHE F. DYNER,
STATE PLANNING COORDINATOR

October 28, 1982

Mr. Jim Biggins
Bureau of Land Management
136 East South Temple
Salt Lake City, UT 84111

Dear Jim:

SUBJECT: DOI/BLM; Price River Grazing Management EIS
State Application Identifier #UT820917-030

The Resource Development Coordinating Committee of the Utah State Clearinghouse has reviewed this proposed action and comments from the Division of Wildlife Resources are attached.

Thank you for the opportunity to review and comment on this document. Please address any questions regarding this correspondence to Hunter Weiler at 801-533-4970.

Sincerely,

Marthe F. Dyner

Marthe F. Dyner
State Planning Coordinator

/dr

116 STATE CAPITOL BLDG. • SALT LAKE CITY, UTAH 84114 • (801) 533-5245

STATE OF UTAH
NATURAL RESOURCES & ENERGY
Wildlife Resources
1596 West North Temple • Salt Lake City, UT 84116 • 801-533-9333

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Douglas F. Day, Division Director

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AND ENERGY

[illegible] Rec'd. NOV 01 1982

ROUTE TO: INITIAL DATE
☐ DIRECTOR
☐ A.D./ENERGY & MIN.
☒ A.D./RESOURCES MGT.
☐ ADMIN. SERVICES
☐ FED./STATE COORD.
☐ PUBLIC AFFAIRS
☐ PROJECT BOLD
☐ DATA PROCESSING
☐
☐
☐ FILE

October 19, 1982

Mr. Milo Barney, Associate Director
Department of Natural Resources &
Energy
1636 West North Temple
Salt Lake City, UT 84116

Dear Milo:

We have reviewed the Draft Environmental Impact Statement for grazing management in the Price River Resource Area. Alternative "B", the planning recommendation, is the management scheme that best provides for the needs of wildlife in view of other uses that will unquestionably persist. There are, however, some modifications to Alternatiave "B" that should be made. Two specific comments and one general comment follow:

20.1 Page 25, paragraph 5: Feasible wildlife introductions should be allowed as cooperative agreements are developed and not just where agreements already exist.

20.2 Page 25, paragraph 6: Vegetation manipulations are only designed and evaluated for benefit to livestock; an increase in wildlife AM's should also be considered.

20.3 Also, more emphasis should be made in the final decision for improvement of quality of all riparian and wet meadow areas in the resource area.

We appreciate the opportunity to review and comment on this E.I.S.

Sincerely,

Douglas F. Day
Director

Board/Warren T. Harward, Chairman • L. S. Skaggs • Lewis C. Smith • Jack T. World • Roy L. Young
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20.1 Response: Alternative C provides for all feasible wildlife introductions to be allowed as cooperative agreements are developed, P. 34, para. 1. Alternative B used existing agreements as the criteria for providing a range of alternatives. Under Alternative A, no wildlife introductions would be permitted if impacts to livestock were anticipated.

20.2 Response: Vegetative manipulations are proposed for the benefit of livestock grazing. All increases in AMs are, therefore, given to livestock. It is noted, however, that some increases in forage will benefit wildlife, as diets of livestock vary from big game. Design of these vegetative manipulations have taken into consideration minimum wildlife requirements for thermal cover.

20.3 Response: Livestock grazing restrictions in Alternatives B and C were proposed for the improvement of quality of riparian and wet meadow areas in the resource area. Also, grazing systems and treatments, as discussed in Chapter 1, P. 11, could provide management of riparian and wet meadow areas resulting in improvement of these areas.

1792 (U-060)

(21)

WHOA!

WILD HORSE ORGANIZED ASSISTANCE INC.
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504
Telephone 323-5908
Area Code 702

BOARD OF TRUSTEES
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In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

Kathryn Cushman
Box 26
Canterbury, New Hampshire 03224
October 26, 1982

Leon Berggren
Area Manager BLM
P.O. Drawer AB
Price, Utah 84501

SR/PR Rec'd. NOV 01 1982

Dear Mr. Berggren:

Thank you for the opportunity to comment on the Price River Grazing Management Draft Environmental Impact Statement.

21.1 Am I correct in assuming that Alternative B, Planning Recommendation, is the preferred alternative? Alternative B is not acceptable in regard to wild horses. Alternative C presents a better, fairer allocation of AUMs for wild horses. A herd of 70 would be less susceptible to the effects of environmental stress and would be less subject to inbreeding. In light of the fact that Alternative B allows for approximately 44,000 AUMs allocated to livestock, 840 AUMs for wild horses is not an unreasonable request.

The study indicated that the decline in the horse population (150 animals in 1973) may be caused by illegal capture and/or shooting. (p. 56, Wild Horses, Price River GMDEIS) It would be advisable to introduce some mares rounded up from other areas into the Price River herd to strengthen it and provide reproductive animals. This action would also cut down the possibilities of inbreeding, since at present there is a lack of females and young.

21.2 Even at a minimun population of 70 animals, this will be a small herd and will be easy to manage. Providing water sources in the area where the horses are to be encouraged to remain will keep them in the desired area. It should be made clear that the animals will be protected from illegal capture and harrassment and that violators will be prosecuted.

Again, thank you for the opportunity to comment.

Sincerely,

Kathryn Cushman

Kathryn Cushman
WHOA

cc: Dawn Lappin

21.1 Response: Alternative B was the preferred alternative in the Draft EIS. In the Final EIS the preferred alternative for initial action is No Action. See Final EIS Title Page and text change to P. 35 of the Draft. The forage available to wild horses under Alternative B was determined through the SVIM allocation model. For Alternative B there were no constraints placed on population numbers of any grazing species. See Appendix 3 of the Draft for the methodology used to establish population constraints.

21.2 Response: It is Bureau policy to investigate suspected violations of the Wild Horse and Burro Act. Where legal evidence warrants, violators are prosecuted. However, due to limited personnel and the large, remote areas inhabited by wild horses, initial detection of illegal activity is difficult.

(22)

Oct 28, 1982

SR/PR Rec'd. NOV 01 1982

Leon Bergman
BLM Office
Price, Utah. 84501

Dear Mr. Bergman,

This letter is in regards to the E.I.S., and how I feel on the situation.

First of all, let me state. I am a rancher. Maybe you may think that my thoughts prejudice, but I can't see any point in cutting livestock grazing on public lands.

I have lived in this area for 38 years, on the range, from Desolation Canyon, the Range Creek area; to Scofield, and now I am in 9-mile Canyon. I know most of the areas, as I have been over most of it on horse back.

To begin with, we have had one cut after another on livestock grazing throughout my life, with a promise that it would improve grazing and forage, which would enhance us more room for wildlife and livestock. I have never had any A.U.M's that were cut, ever returned to me.

Twenty years ago, there was a greater number of livestock in the area and also a greater number of wildlife than there is today, so in my personal oppinion; cutting livestock grazing is not the answer to increase game herds.

Let me state that I am not against wildlife or the sportsmen.

In the 9-mile area, where I run my cattle on public land and private land, the greatest carring capacity is on private acres, plus the water. I know I have hundreds of deer on my private land all year round. We feed them 12 month out of the year, especially in the spring, right in the middle of my alfalfa fields. I figure I loose one cutting of hay to the wildlife. I think I have donated to the wildlife all I have to.

All I can gather from your EIS statement, is your plotting the sportsmen against the livestockmen. If this is the case, both sides will loose greatly.

Every small rancher that is forced out of the livestock business, usually sales out his private property to prominate business men, who either make it their own private hunting, or they turn it into realestate sites. Then the sportsmen are both out of business.

In closing my comment. I recommend to leave public grazing the way it is at the present time.

Sincerely yours,
George Fasselin, Jr.

SR/PR Rec'd. NOV 01 1982

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Earth First!

October 29, 1982

Leon Berggren
Price River Resource Area Manager
BLM
PO Drawer AB
Price, Utah 84501

Dear Mr. Berggren

I suppose I could say that we are disappointed in the wilderness-destroying preferred alternative for your grazing EIS around Desolation Canyon. But we aren't diappointed or surprised. Your blind attitude towards the negative impacts this egregious plan will have on the exceptional wilderness values of Desolation Canyon is typical of the Bureau of Land Management in Utah.

23.1 It is obvious that the recommendations for chaining and intensive range developments within the WSAs and other roadless areas around Deso are merely one more step in the plot to disqualify large acreages from wilderness designation.

There are other values on the public lands besides forage. While I recognize the social values of the range livestock industry, I also recognize that livestock grazing has caused more ecological damage in the arid West than any other factor. On behalf of Earth First!, I recommend that no further range projects of any sort take place within any of the WSAs, appealed areas, or other roadless areas carelessly discarded earlier in the process within the Price River RA. Moreover, commercial livestock grazing and existing improvements in the entire Desolation Canyon/Book Cliffs Wilderness Complex should be phased out to eliminate conflicts with wildlife, wilderness, and ecological values.

Desolation Canyon is one of the most significant wilderness ecosystems in the United States. I wish BLM could see it.

Sincerely

D Foreman

Dave Foreman
PO Box 235
Ely, Nevada 89301

23.1 Response: As stated on P. 96 of the Draft, these lands will be managed according to BLM's Interim Management Policy (IMP). Under this policy, surface disturbing range developments would not be allowed; therefore, there would be no effect on wilderness designation. The effects of wilderness or non-wilderness designation on these areas is the subject of the Wilderness EIS presently under preparation by the BLM in Utah.

Oct 30, 1982 ㉔

SR/PR Rec'd. NOV 01 1982

Dear Mr. Berggren,

We would like to make some comments concerning the proposals in your recent publications.

We feel that the way we have been using the Staker allotment, that it is in good condition. We feel that it should remain the same, in time and AUM's.

24.1 Because of the predators at this time we feel its not feasible to use this allotment for sheep. In the future, if the predators are controlled, and we still have sheep, we would consider using a percent for sheep.

This allotment is surrounded by private land and homes on three sides. For this reason it is impossible to preserve it for deer.

We feel that the time schedule we are using in this allotment, is not hurting it in any way. The feed is all matured by Oct 15 and ready for grazing.

24.1 Response: See response to hearing comment 4.2.

The six weeks in the Spring, we only use 15 AUM's during March and April.

The cattle feed mostly on the canal banks and on the bunch grass that comes early and they won't eat it any other time. On average years it grows back and seeds.

24.2 We feel that for our operation, the way that we have been using the allotment, is the best for us and the allotment. To make changes would mean building fence and putting in some cattle guards.

Sincerely,
James and Shelly Staker

24.2 Response: See response to hearing comment 4.2.

83/PR Rec'd NOV 02 1982 ㉕

We agree with proposition A for Consumers wash and Pinnacle Bench Allotments. But we do not agree with any of the proposals for North Springs. So we will have to agree with 0 for North Springs.

Pete Stamatakis
[illegible] Stamatakis

FRIENDS OF THE RIVER
Southwest Office • Box 1115 • 20½ East Cherry Street • Flagstaff, Arizona 86002 • 602/774-0130

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November 3, 1982

Mr. Leon Berggren
Price River Resource Area Manager - BLM
P.O.Drawer AB
Price, UT 84501

SR/PR Rec'd. NOV 08 1982

RE: Grazing Improvement EIS: Comments

Dear Sir:

Please include these comments in the official EIS record regarding grazing improvements.

Friends of the River is a political, research, and educational organization dedicated to the preservation of our free-flowing rivers and creeks, and the conservation of our water and energy supplies. As such, we are concerned with development that may impact the Green River and its tributaries, in Desolation Canyon.

26.1 We believe that the grazing improvements as proposed in the EIS would cause undue degradation of lands within several Wilderness Study Areas (including Desolation Canyon) and other critical areas for wildlife habitat and other protected wilderness values. Chainings especially, would certainly impair the suitability for ultimate Congressional wilderness designation of the Desolation Canyon unit and other units under appeal. Such impacts and "undue degradation" are also contrary to the BLM's Interim Management Policies and Guidelines for WSA's (IMP).

We believe that a more meaningful and viable range of alternatives can be formulated in order to protect both wilderness and ranching values. Certainly, no large projects should be implemented in a designated WSA or appealed unit. The Cedar Mountain, Sulphur Canyon, and Wildcat Canyon areas should also be better protected for wildlife. Alternative C should apply to these areas.

Friends of the River is therefore recommending that the alternatives and wildlife impact analyses be re-formulated and refined. We appreciate this opportunity to comment.

Sincerely,
Robert Lippman
Robert Lippman
Southwest Representative,
Friends of the River

26.1 Response: See response to letter comment 7.1.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295-0699

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SR/PR Rec'd. NOV 19 1982

NOV 15 1982
Ref: 8PM-EA

Leon Berggren
Area Manager
Bureau of Land Management
P.O. Drawer AB
Price, Utah 84501

Dear Mr. Berggren:

The Region VIII Office of the Environmental Protection Agency has completed its review of the Price River Grazing Management Draft EIS. In general we agree that alternative B appears to be a balanced approach to dealing with the problems in the grazing area. However, as noted in Table 10 of the DEIS, the watershed condition trend will not improve but become static and there will be some continued deterioration of riparian and wet meadow areas.

27.1 Perhaps additional watershed protection and enhancement measures can be incorporated into alternative B to improve the water quality and riparian habitat and improve erosion and streambank problems.

According to the system EPA uses to rate draft EIS's, the Price River Grazing Management Draft EIS will be rated as LO-2. This means that although we have no objections to the project as presented in the DEIS, we would like to see additional water quality protection provided. If you have any questions contact Dennis Sohocki at FTS 327-4831.

Sincerely yours,

Steven J. Durham
Regional Administrator

27.1 Response: Such measures are proposed in Alternative C and are analyzed there. The decision maker has the option to select parts of any alternative analyzed in the EIS in the formulation of a grazing management program for this area. Your recommendation will be considered in the development of this program.

SR/PR Rec'd. NOV 26 1982 ㉘

November 23, 1982

Mr. Leon Berggren
Area Manager, BLM
P.O. Drawer AB
Price, Utah 84501

Dear Mr. Berggren,

I would like to make the following comments about the Price River Grazing Management Draft EIS:

1) Alternative A should not be used. BLM land is supposed to be multiple use. Alternative A reduces it to single use.

28.1 2) Pinyon-Juniper woodlands should not be chained. Let the Public harvest the standing trees for firewood instead. This is a lot cheaper than chaining.

3) All areas that are chained should be cleaned up and burned. Leaving the chained area with trees and brush covering the ground makes that area unusable for any kind of recreation.

55 4) All chaining and burning projects must have a complete archaeological inventory before any chaining or burning takes place. Literature searches for archaeological sites are entirely inadequate since few sites have been recorded. A complete cultural inventory should be made before any range improvements are undertaken.

28.2 5) An archaeologist should always be on hand during any chaining or burning project in case any new archaeological sites are discovered. All archaeological sites should be excavated before the project begins. Leaving "Islands" around archaeological sites in the chained areas is an open invitation to "pot hunters".

28.3 6) Disturbed areas should be reseeded with native grasses only.

28.4 7) No vegetation manipulation projects should take place on Deer, Elk, or Moose Critical Habitat or on Bighorn Sheep Habitat unless it will have beneficial effects for the Wildlife involved.

8) Alternative C is the Preferred Alternative.

Sincerely,

Owen Severance

Owen Severance
P.O. Box 1015
Monticello, Utah 84535

28.1 Response: Chaining of pinyon-juniper woodlands is a viable method to increase vegetation production, and will be a part of the future range management program. Public or commercial harvest of standing trees, may also be considered. The type of treatment and disposal of trees will be decided during the planning and site specific environmental assessment that takes place prior to each project.

28.2 Response: As stated on P. 18, Item 5 of the Draft EIS, an archaeological inventory would be made prior to any surface disturbing activity. If cultural resources are found reasonable efforts will be made to avoid adverse impacts and through consultation with the State Historic Preservation Officer (SHPO) effective mitigating measures would be developed.

28.3 Response: Where possible, native species will be used; however, due to seed availability, scale of project, or applicability of other species, introduced plant species may also be used. The effectiveness of reseedings using introduced species has been established through several successful reseeding projects in the State.

28.4 Response: The effects of any vegetation manipulation project on big game species would be analyzed in a site specific environmental assessment prepared prior to initiation of any project. At that time, the feasibility of the project for wildlife would be determined.

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PRICE RIVER GRAZING MANAGEMENT DRAFT ENVIRONMENTAL IMPACT STATEMENT

Analysis of Report by Evan R. & Linda M. Muth
Licensed Permittees--PRRA

We wish to commend the BLM and particular the members of the Price River Resourse Area staff for the complete, compassionate and totally unbiased report of our resouse area. We feel that this report has taken into account every aspect of the area, considering the feelings and interests of all concerned parties. Although none of us can be truely happy with every aspect of this report, we believe that the report encompasses a very deep commitment by the staff to address every issue including recreation, sheep and cattle operations, mining and energy, big game and small game as well as the invironment. The watershed, vegetative studies, erosion, and the salinity situation all required consideration that appears well documented in this report.

The economics of recreation, hunting and ranching have been researched. We believe that the range that belongs to us all, must be maintained so as not only to give pleasure to all; but, to give economic benifit to the operators, who are really advocates for the land, wildlife, and domestic animals. None love the land more than he who must and does derive not only pleasure from his way of life but also his whole livelihood.

We will now attempt to analyse this statement in part with questions and comments, some pro others con.

INTRODUCTION

P-1 As stated: BLM is required to maintain public lands on a sustained yeild for livestock grazing and maintain the environment as per title 43 CFR subpart 4100.2 Grazing Administration

We agree that we have a need for improving and maintaing the range. We realize that basically a national suit filed in Federal Court in 1973 by the National Resourse Defense Council Alledging that BLM grazing EIS did not comply with the National Environmental Policy Act is the main reason for the intensive research that has been done.

P-2 Because of the complexity interaction between interagencys both state, Federal, and local plus privately owned holdings is mandatory.

P-5 We agree that the major issues are: Livestock grazing on wildlife spring, fall, and winter ranges.

Point: Because a lot of summer grazing by wildlife, (primarily deer) is on private ground a give and take attitude we feel is very much needed.

P-6

VEGETAION MANIPULATION

29.1 We feel that present chainings water projects should be maintained and any further projects should consider leaving a more natural type of area, incorperating more wooded areas with smaller parks this enhancing watershed, herbacious cover and still maintaining thermal cover for wildlife and domestic livestock.

29.1 Response: These considerations will be incorporated in an environmental assessment for individual projects.

We feel that firewood removal on chainings should be more closely monitored. A use fee could be charged to private as well as commercial wood cutters. Additional water development and fencing and by not excluding anyone season of use but a rest rotaion plan be implemented to maintain and upgrade current range conditions should be done as funds are available.

PP-6-9 COMMENT: To group allotments into categrorizes for distribution of funds and improvements is good as long as flexibility can be maintained.

CHAPTER I

Description of Alternatives
(AMP) Allotment Management Plan

P-11 Treatment 1: Rest for four consecutive years or until browse is established would probably be an economic disaster if operators were required to sell stock on a "down" market.

Treatment 2. Same economic result as #1.

Treatment 3. Rest from livestock grazing from spring of one year to midsummer the following year would probably work.

Treatment 4. Livestock grazing midsummer through fall, appears to help reseed without undo privation of the ernest operator.

Treatments 5, 6, 7, and 8 all have there merits and all should be viable considerations.

29.2 PP-11-12 Grazing suitability and water distance travel by stock, plus erosion and forgge productivity are negotionable, taking into account livestock involved and feasibility of the alternatives. We have no problem with the proposed 5 allotment consolidations; however, any further consolodation, especially any pool allotment with an already existing private allotment would create uncontrolable management problems.

PP-12-13 It appears only to alleviate paperwork and management problems by consolidation of allotments.

29.3 P-14 Season of Use: Beginning and ending dates of each season of use are only limits. COMMENT: We disagree with this statement because of the veriables in feed, weather and stock conditions. If the options to move to areas favored by weather, availability of water or snow, frost in ground etc. are limited by set dates it may be very detrimental to a helpful plan towards upgrading a range.

P-16 Monitoring and implementaion should be done with the operator taking a very active part since he or she is probably the very closest associate of the land.

PP-18-19 STANDARD OPERATING PROCEDURES

29.4 All are good points of consideration. Would only add that operators must have viable alteranatives to feed livestock during periods of abstinence from areas being improves. We don't know how; but, wildlife must be controlled during periods of vegitation manipulation and reconstruction of browse. Utah Wildlife Resourses has got to better manage their game herds, more specifically the deer herds. We really don't have to many deer, but a poor distribution of them. Especially

29.2 Response: See response to Hearing Comment 9.3.

29.3 Response: See response to Hearing Comment 4.2.

29.4 Response: See response to Hearing Comment 4.2.

considering critical winter areas , since this is the time when carrying capacity of a range most readily shows up.

PP-19-36 Desicription of Alternative Analysis

COMMENT: States well the objectives of the four alternatives and a good summary of the various impacts.

29.5 P-36 Perhaps doesn't aim to, but putting economics the last impact when perhaps it may very well be the most important measureable impact. If it is not economically feasible livestock grazing, forestry, mining and even recreation to a point would probably not occur!

CHAPTER II PAGES 39-72

P-39 We appreciate all the work done on an area that is so varied in elevation and precipitaion.

P-41 States that SVIM data is the best vegetation and soil studies available for the EIS area.

29.6 We feel that is is important to continue updating and monitoring the work that was done in 1978-79 field seasons. Drought was a factor and we're sure it was considered in field studies. It is important for an ongoing continual study to be maintained. This work could also provide needed employment dureing the summer months for students.

P-42 RIPARIAN VEGETATION: Statement that present degradation is due to livestock abuse as well as fire, road construction and people.

29.7 QUESTION: How much does salt play in affecting riparian areas far from headwaters?

P-43 ASPEN: Statement: That livestock are main contributing factor to the loss of climax aspen in the EIS area.

29.8 QUESTION: What part do wildlife play in destroying young shoots? Just how much do wildlife destroy?

PP-43-44 MOUNTAIN BROUSE: In referance to Pinacle Bench statement that "all the Mahogany is over 40 years old indicating no reproduction."

29.9 QUESTION: How much of these brouse species were present 40 years ago? Has climatic changes been partially responsible for no new plants?

STATEMENT: It appears that domestic livestock, in particular sheep, get most of the credit for the downward trend and granting that they may be strong contributors, we feel that excessive deer wintering in this area and the failure in past years of the UTAH Wildlife Resouses to foresee and harvest some of these excess females is a major contributor to the decline in mountain brouse.

29.5 Response: The summary statement on P. 36 of the Draft only indicates impacts in order of appearance in the Draft. This order is the traditional BLM grouping for EISs and should not be considered as an order of importance.

29.6 Response: See text changes for PP. 14 and 16 of the Draft.

29.7 Response: Fires, road construction, and other human activities certainly have played a role in the degradation of riparian areas. However, the evidence overwhelmingly supports the statement; "Abuse by livestock is certainly the most significant." This is especially true in more arid areas where water, and associated riparian vegetation, is at a premium.

By virtue of their saline soils and underlying geology, downstream riparian areas are already adapted to saline conditions. It is possible that the increase in salt loading attributable to agricultural irrigation practices may have a detrimental effect on riparian vegetation, but it is believed to be an insignificant or minor impact.

29.8 Response: There have been several studies done comparing the impacts of livestock and deer on aspen stands. The majority of these studies identify the livestock use as being a greater impact than deer use. Publication 72-1 by Utah Division of Wildlife Resources titled "The Effects of Deer and Domestic Livestock on Aspen Regeneration in Utah" concludes: "The data indicate that populations of deer that were present at the study sites during the study had little effect on the development of aspen reproduction. By contrast, where livestock were present together with deer, utilization of aspen and terminal bud removal were substantially greater than where domestic livestock were absent" (Smith, et. al., 1972).

29.9 Response: We don't know the abundance of browse species 40 years ago. The presence of old individual plants indicate the species were present and reproducing here in the past. Climatic changes have had little to do with the lack of reproduction. Similar sites in the area and region having different grazing treatment do show reproduction. Most of these browse species reproduce on second year's growth. When excessive utilization occurs, reproduction cannot take place. We do recognize that high deer numbers have also impacted the browse on Pinnacle Bench.

P-44 PINION-JUNIPER WOODLAND: We are in favor of controling stands by chaining--again may we suggest a more controlled setting leaving more wooded areas and smaller parks increasing productivity, but maintaining more thermal cover. Restricting salvage of wood with strictor controls on commercial wood cutters would also help with reseeding by lodging winter moisture to aid the young plants in earlier maturation before the moisture depletion retards growth.

P-44 SAGEBRUSH-GRASS Statement: Would like to see more of a balance between herbacious vegetation to woody sagebruch. Solution: Perhaps more controled burns are needed.

PP-44-45 VEGETAION MANIPULATION AREAS: Statement: Feel that is is vital in light of prior moneys spent to mantain chainings and seedings in optimum condition for production of grazing plants.

P-45 LIVESTOCK GRAZING
Allotments: Statement: It appears that less than ½ of the operators have herds of economical size--more than 100 cows or 500 sheep and derive only ½ there
29.10 income as such.

QUESTION: Is it unfeasible for full time operators to consider "making a living off of the land?"

P-47 ALLOTMENT MANAGEMENT PLANS:
Statement: AMP's are a good idea that should remain flexible considering weather and forage as well as time and money needed to implement desired objectives.

P-47 SUITABILITY
1. Some slopes in excess of 50% may be suitable but acknowledge some are not.
29.11 2. BLM States areas farther than 4 miles from water are potentially suitable.
COMMENT: If your cows are "true range cows" they will range further for water; but, have to admit they do make trails that are conducive to erosion.

P-48 WILDLIFE
Comment: Interesting that BLM has taken the time to note 368 teristrial and 25 aquatic forms of wild life in the PRRA.

PP-52-53 MULE DEER: Comment. We do not want to see existing chainings abandoned, but maybe modified. We feel that existing herds far exceeds current capacity and significant reductions in herds are warranted. Especially since we are talking of doing away with existing sheep use.

29.12 P-53 QUESTION: Are we trying to build a viable huntable herd of pronghorn antelope or simply a herd to look at? How serious is current sheep use on Icelander herd territory? With sheep numbers down is there really that much compition?

P-53 ELK: Comment: It seems that elk are in good shape--feed and numbers and we could probably stand to increase the elk herds.

P-54 Rocky Mt. and Desert Bighorn Sheep
Comment: Considering the small herd numbers, disease is a serious threat to these animals, but we feel that with proper parasitic control in domistic sheep that is is not an unsurmountable problem. As far as forage compition we don't believe that the small numbers of sheep and inaccessability of some of their range to domestic competition is a very serious threat to the bighorn population.

29.10 Response: Most operators with herds of less than economic size are not earning a return to their investment and labor. They are not earning any portion of their income from their operations. Many have to subsidize their livestock operation with other earnings. Larger operators can, over the long term, make a living from livestock operations. Their chances of making a living depends on the efficiency of their operation and their ability to survive market fluctuations.

29.11 Response: Research information shows that as the steepness of slope increases, there will be less utilization of forage. It requires effort and energy by the grazing annual to graze upslope, therefore, it is easier and less tiring to stay on level areas and graze longer there. Plants growing on nearly level terrain or in lowland positions are much more susceptible to grazing pressures than plants on steep slopes because of accessibility. Also plants growing in bottom areas are apt to stay greener longer than are plants on steep shallow soils (Arizona Interagency Range Committee, 1972, Proper Use and Management of Grazing Land, PP 12-37). In short, cattle will not make substantial use of steep slope areas without overutilizing bottom areas.

As with slope, there are numerous studies of the distances animals will travel for water and the associated impacts to the range. Most studies recommend that water be available within 1 mile in rough country and within 2.5 miles on level terrain. Allocating forage outside the service area of water results in overuse of the vegetation within the service area.

29.12 Response: The Icelander antelope herd was established by a transplant of 149 antelope in 1972. The first hunt on this herd was held in 1975 and since then it has been hunted annually. Efforts are continuing to expand the present herd into suitable habitat, increase the stability of the herd, and also improve hunting opportunities.

Current sheep use, if measured in average licensed use, is not seriously conflicting with the Icelander antelope herd.

P-54 MOOSE: Statement: Its good to have them and we all enjoy seeing them. They cause no problems.

PP-54-55 SAGE GROUSE AND OTHER UPLAND GAME: Statement: All are important to ecology and the recreation of the area. It seems that there is a very difinite need to some how increase the fishing in this area as there is such a demand for this type of sport.

PP-56-57 WATERSHED: Reported information very well states the condition of this area considering our major problem of salinity and erosion. Agriculture is on the decline as water is diverted to other areas. We still have a need to repair and maintain water projects and to go ahead with new conservation projects.

29.13 P-58 FOREST PRODUCTS: COMMENT: Would like to see a users fee charged such as a $5 to $10 per cord fee. This money could be used as part of the cost of additional chaining. Wood is a renewable resourse. Issueing additional permits in already depleted areas is a definite factor in moisture loss resulting in loss of plant vital ity and consequently loss of feed for domestic as well as wildlife. At $10 per cord base on 1981 permits issued would amount to $67,160 which could have been used for additional chaining projects.

PP-58-61 Recreational values are very high in EIS area; but, to the stockman it is not only a good way of life but an economic necessity to maintain and improve the range.

P-61 WILDERNESS: Future wilderness designations will not affect the nature of stock since most areas must be serviced by horse back anyway. Wilderness desi gnation in a lot of ways would help ranching interests by eliminating motorized vehicles that do considerable damage to the invironment. I t hink most people want to preserve our primative and wilderness areas.

P-62 CULTURAL RESOURSES: Most definitely we need to protect our past heritage and even under strict suppervision be allowed to leave some modern day signs of our time--such as allowing paintings on some areas of our way of life for future generations to observe.

PP62-71 SOCIOECONOMICS: Agricultural economics would probably be hurt beyond repair if carefull attention isn't used in selecting the alternative to manage the land. Although agriculture has a tendency to servive despite all odds, it is almost doomed to failure as much as we would like to believe we are really a most needed part of the economy. Dollar for dollar value of feed on public versus private feed is not totally definable because of services & ability to regulate variables.

P-64 Comment: Agree that high wages in other areas affect the ability to acquire and maintain quality help in agriculture. This is a direct cause of more and more land being diverted from agriculture.

P-66 Comment: Agree that comparisons between BLM forage and privately leased are hard to compare. Captilized values very definitly affect the operators base property value and their ability to borrow money.

PP-68-69 Comment-Because of the questionable future of grazing fees and privilages some credit institions are most definitely calling in their loans--correlating directly on the ranchers economic viability and hiring of outside help.

29.13 Response: Money collected from the sale of forest products goes into the U.S. Treasury and is not returned to the area where it is generated. Legislation would be required to implement the scheme you have described. We do recognize that wind rows of chained trees do act as snow fences and hold moisture on the site. They also provide cover for birds and small mammals.

PP-69-70 WILDLIFE & RECREATION: Comment: Wildlife, recreation including boating are most definitely contributors to our economy. We agree that such activities such as hunting and boating are hard to gauge, yet the economic benifits most definitely contribute and must be considered valued.

PP-70-71 COMMENT OF SOCIAL CONDITIONS: Insight and feeling for all users is shown here. If people would take the time to read this report, maybe they would feel better about BLM Management of our public lands!

CHAPTER III ENVIRONMENTAL CONSEQUENSES
PP 73-136

P-75. COMMENT: Alternative A would most definitely keep the stockman the happiest but would certainly upset the wildlife advocates who feel that all the stockman wants is to be rid of the game. This is untrue--we just need a better balance!

PP-74-75 COMMENT: Assumptions and analysis Guidelines are probably as good as you can expect at time of writing. Certainly market declines and available moneys for BLM & ranching will certainly limit management and implementaion of any plan.

29.14 PP-75-76 COMMENT: On spring grazing of plants. From our personal knowledge we have found that is is desirable to crop some spring pastures because it will cause the plant to expand and deepen the root system. The plant is then more able to withstand drought and other adverse conditions. Cropping of early growth will also cause the plant to "stool" out which results in more ground cover that aids in moisture retention. Of course this grazing period must be closely monitored and must be followed by adequate rainfall.

According to Jardine, J.T. Lindgren, H.A. & Potter E.L. "Management of Range Grazing" Oregon Agr. Ext. Bul. 366. Nov. 1923. "No range should be used before the grass is two weeks old or until the soil is reasonably dry. No range should be grazed so heavily that there is mechanical injury to the grass through trampling or close cropping. In all normal years the stock should come off in good condition with some little feed left on the range. The grass must have a chance to form seed at least every three or four years, and the following spring the seedlings should have a chance to grow.

Rotation grazing could serve to carry out the proposed reseeding by natural means without reducing the carrying capacity of a range.

29.15 PP-98-99 COMMENT: March-May exclusion of livestock on public lands would be a total disaster as far as calving drop, thriftness and desease amoung young calves. Silage and alfalfa fed to cows prior to lactation and calving increase milk flow and as a direct result increases scours, which may lead to respiratory problems many of which are fatal. Calving problems are increased due to lessor amounts of exercise and also "bumping" of cows does result in more unnatural posistioned births, requiring more calves "pulled" or assisted into this world.

The general well being of the young calf in his first sixty days will pretty much dictate what his whole growth cycle will be. It is not economically feasible to keep cows in confinement during the last trimester of pregnancy nor the critical first months after calving. Replacing range forage for on the farm feed is not the answer because of the above problems. Herd reduction only serves to make and already economically shaky unit a totally unfeasible operation. Labor costs would go up as well as additional matinance requirements on extra machinery required to feed. If you have to deliver feed to a mother cow rather than her foraging for it, you can not afford to own her!

29.14 Response: Fall barley, winter wheat, and lawn grass are excellent examples of the effect you describe. As is pointed out, moisture must be available after cropping of early growth. Precipitation cannot be assured on our native ranges in the late spring. Research indicates that native perennial grasses growing under range conditions are intolerant of spring grazing.

29.15 Response: The increased lactation described can occur any time cows are fed a high protein diet. The same problem can occur on crested wheat seedings or native pastures. It is difficult to evaluate the impacts to calf crops without knowing more about the conditions the animals will be in. Certainly there are many successful cattle operations that do well calving on or near the home ranch.

P-103 ALTERNATIVE B Mt. Browse: Proposed to eliminate sheep grazing on 7 allotments. 29.16 If this goes through as proposed we would like to suggest using some of the sheep allotments listed under Salt Desert Shrub heading. This could be issued on a temperary non renewable basis to existing active permittees but not taking away the rights of thepermittees who have been and probably will continue to take none use. Now we find upon further reading that not only are the sheep conflicting with deer production, but also with the antelope. Is it fair to withdraw all sheep use in these 10 allotments as well as the 7 other allotments? We would like to suggest a rotation of these areas west of Price with some of the lower allotments that are virtually in perpetual non use. I think we all must realize as I know we do that the deer and possibly the antelope are playing "hell" with part of this land. We do believe in some areas deer damage is far worse than that by domestic stock.

PP-104-105

Livestock Grazing: We disapprove of eleminating totally sheep use on the Consumer Wash, Hiawatha, Pinnacle Bench, Porphry Bench and the North Spring allotments. We feel that the extreme high winter concentrations of deer has done more damage than domestic sheep!

WILDLIFE: We do not believe that livestock ristrictions should be cut so drastically as to favor the wildlife. We still maintain there is room for all if UDWR would better manage and HARVEST their animals.

29.17 MULE DEER: Herd reduction is definitely called for either by hunting or transplanting especially on herd unit 32-33 regardless of the alternative management plan selected. Winter kill are not pretty and are extremely unproductive. One factor not discussed in herd numbers and large concentrations of deer is the greater risk of disease.

29.18 P-106 SEASON OF USE Kind of Livestock: We disagree with keeping cattle on critical wildlife until Aug 30; because, if you keep an animal at that elevation through that much heat and then go to a higher country the risk of pneumonia and other respiratory diseases is increased 10 fold. It is certainly not practical to stay till the last of August and then go to higher country and kill a bunch of your calves with radical temperature changes. Granted if may improve plant vigor but is at the expense of weight and health of livestock, its not worth it. It would be better to consider more fall and winter use by cattle. Which would also help in seed dispersion and incorperation.

PP-106-7 PRONGHORN ANTELOPE: We do not believe that livestock should have to take all the use cuts to enhance antelope population.

Elk--Would like to see the herds enlarged or maintained.

29.19 P-108 DESERT & ROCKY MT. BIGHORN SHEEP Impacts from domestic sheep I feel are over stated. Disease transmission I'm sure was a contributing factor to the decline of the bighorns in the early 1900's; but, we now have more comprehensive health mantenance in our herds than did our forefathers. What with worming and vaccinating the dwindling herds and better range management I can't see that domestic sheep would really interfer with the betterment and expansion of the bighorn herds.

P-110 WATERSHED: Sheep & cattle dung may be offensive to some recreationalists but I think we have over-looked the fact thatit is a "natural" & "cheap" fertilizer which certainly does put back nutrients required for additional plant growth.

29.16 Response: Elimination of sheep grazing on critical antelope range was proposed in Alternatives B and C. There is considerable dietary overlap especially in the spring where both species are seeking out forbs. Under present BLM regulations and policy excess forage could be allocated on a temporary nonrenewable basis to qualified applicants.

29.17 Response: The need for mule deer herd reduction in herd unit 32-33 is identified for all alternatives with the most severe reductions called for under Alternative A, Maximize Livestock Resources. Your point is well taken and admittedly was not discussed in the analysis. Risk of disease among free-roaming wildlife populations is greatly increased by high concentrations or overcrowding. Overcrowding of mule deer in herd unit 32-33 occurs only on critical winter range in normal or severe winters, and is not a problem during mild winters or on summer range. Also, many diseases known to increase during overcrowding require warm, moist conditions for transfer of disease.

29.18 Response: See response to Hearing Comment 4.2.

29.19 Response: Disease transmission was identified along with competition for forage and space as potential impacts of domestic sheep grazing. There is some disagreement in the literature as to the potential for impacts from disease transmission. Jim Yoakum (1963) cites an example of two bighorn sheep introductions in Oregon on domestic sheep ranges. Gallizioli (1977) still strongly supports the removal of all domestic livestock from desert bighorn sheep habitat to prevent disease transmission problems.

P-111If 45 cattle operators were to take a 58% reduction from their average licensed use you can just about guess that it would put 3/4 of them out of business. It is also safe to assume those who are getting increases probably won't want to share with another who may not have been properly using or has an abused range.

P-113 Of the sheep operators who would experience a 95% reduction from current licensed use, you can safely bet with no other alternatives would be put out of business. By thisplan you would be surely adding to unemployment by putting more people from agriculture out of business and the people they employ out of work.

PP113-114 RANCH VALUE AND ABILITY TO BORROW: We are talking of devaluing 45 cattle operators and six sheepmen who are already in serious financial trouble with declining stock values. This would pretty much insure that they wouldn't be able to cover the cost of borrowing with productionof livestock.

P-114

Anticipated revenue increases from hunter participation would be a boon to the economy but encreased pressure also brings with it greater possibility of hunting mishaps as well as misuse of hunting privileges.

P-115 SOCIAL CONDITIONS: It is clear that a change will be brought about by the BLM. In some cases it is more necessary than in others and must be judged on individual merits. The wildlife advocates spend lots of dollars and time to the betterment of their cause while it is obvious that agriculture has not the vociferous advocates or the money to back up their needs.

ALTERNATIVE C -- ENHANCE WATERSHED, WILDLIFE & RECREATION

PP-115-126

In our opinion alternative C goes against the nature of the whole plan set forth by Congress in maintaining and utilizing our public lands to the greatest advantage to all. If it were to be implemented the restrictions to livestock operations such as forage replacement, herding, fencing, more water hauling and herd reductions would cause a lot of operators to simply fold up and quite. While better management practices are definitly needed Alternative C goes to far in its demands of the rancher to have any practical application.

P117 VEgetation Manipulation--By reinvasion of existing chainings on winter and critical winter ranges it seems to me to be a very self defeating attitude toward moneys already spent in past years to upgrade the range. We are most definitely against implementing Alternative C.

P-125-126 Not only would Livestock operators feel very resentful towards Alternative C most would be out of business--facing a very uneconomical situation in which to try to make a living.

ALTERNATIVE D -- NO ACTION

PP-126-136 Although Alternative D has its advantages for the status quo of today the net long term results appear to negatively affect income, vegetation domestic productivity, wildlife and recreation. There is a need for an ongoing program for water development, erosion control, propagation and redistribution of wildlife; as well as a productive range for domestic livestock. In our opinion Alternative D is not the answer.

In our final assessment of the Price River Grazing Management Draft Environmental Impact Statement, we wish to make a few recomendations in the preparation of the final statement.

1. We recomend that total abondonment of Spring use not be implemented. We believe that rest-rotation can accomplish the desired end with put undo privation to the permittees.

2. We recommend continued projects in range manipulation, such as chaining with moderation, water projects development, (with an eye on the salinity & erosion problems), inventory of plants and general range conditions to be closely monitored.

3. We recomend closer supervision and working relationship with permittees--flexibility as far as weather conditions plant growth, designated seasons of use and a plan to rotate and rest the ranges so as not to be abusive.

4. To help curb range abuse implement stronger fines and punishments to willful cases of trespass and range abuse. At the same time, be flexible enough to grant Non re-newable temporary use of ranges if it is indicated.

5. We recommend that a use fee be implemented for firewood & Christmas tree removal--moneys to be used for range improvement projects. Also that firewood removal permits not be issued in already overly depleted chained areas. Wood is a renewable resourse, but requires a lot of years to do so. 29.20

6. We strongly urge more controls and management of the mule deer herds. Harvesting and transplanting must be done with an eye for the carrying capacity of current range conditions.

7. We recomend an annual fee of say $10 to the public users of the land for recreational purposes. The livestock and energy development people pay their way--why not ask the other segments of use to contribute.

8. Wildlife reintroductions be approached with caution. Would like to see a wild turkey population considered for some areas.

9. We reccomend that the BLM continue to work with an eye for the economic feasibility of proposed plans. Which ever plan or recomendation that is ultimately selected we would hope that comman sense and professional judgement be high on the priority list of implementaion.

10. We believe that basically Alternative B is the preferred plan to follow. Although we certainly do not agree with all proposals, it is our desire to work with and maintain the ranges in the optimum condition for multiple use.

In closing I must make reference to the monumental amount of research as evidenced by the very complexity of this report and by amount of references cited that were used in preparing this statement. A lot of thought and hard work is very much in evidence and we appreciate the effort by the Price River Area staffes for this very comprehensive and complete works.

Most Respectfully Submitted
Evan S Mutt
Linda M Mutt

29.20 Response: The recommendations are appreciated and will be considered in the formulation of a grazing management program for the Price River Resource Area.

Cleveland, Utah
November 22, 1982 (30)

SR/PR Rec'd. NOV 29 1982

To: The Bureau of Land Management

United States Government:

30.1 We the permitees on the Elmo grazing area recommend that you designate grazing use in the Elmo area from the 10-16 until the 11- 30. This will not be a change from previously designated use.

Permitees feel that fall use is more beneficial use in this area because of the snow factor and the water freezing over at the later date. The use of the Elmo permit as it now is coordinates with our fall operations in bringing our cattle from the mountain.

We do not believe that any use by cattle has done or does now conflict with any other use such as wildlife or recreation use.

Thankyou for your concern:
Permitees of the Elmo Allotment

Doyle Allred
William R Allred

30.1 Response: See response to Hearing Comment 4.2.

Nov. 29, 1982 (31)

BLM
Price River Resource Area Office
P.O. Drawer AB
Price, Utah 84501

31.1 In response to the Price River Draft Environmental Impact Statement, Savine's Preston Nutter Ranch would be seriously hampered in its year round livestock activities. The most detrimental would be a permit cut from year round to June 10 through March 15. This would do away with our natural drift from winter range to the higher elevations for summer. It would cause economic hardship by having to hire extra help to move the cows, while not wanting to move and beginning to calve off the winter range. We would have to rent outside pasture and pay for trucking or confine the cattle on the ranch and pay for having hay hauled in, while losing the first crop of alfalfa being raised for the next winter's feed. The headquarters ranch is remotely located in relation to the winter range.

31.2 In view of grazing within the Green River corridor from September 15 to November 15, because of conflict from river runners and damage to the banks, the question arises, "Who is floating the river from November 15 to May 1?" At this point I would like to quote the late Virginia Nutter Price while attending the Powell Centennial celebration in 1969. She said, "This is not a deserted area, only deserted ranchers." Sabine's cattle graze this area when the river banks are frozen and the cattle depend upon snow for moisture. I have seen river banks marred by boaters climbing out of their boats to camp and sliding back down the bank to continue down the river. There is an interesting quote on page 31, "...it would provide for livestock grazing on a sustained yield basis at a level having the least possible impact to other resourse uses or users.

31.3 Also, in Alternative C, by having no grazing in Green River, Flat Canyon and tributaries, Nine Mile Creek, Cottonwood Creek and tributaries, this area is the only trail route we have to move livestock to or from the headquarters ranch or on to our private property.

In view of no grazing in sage grouse strutting and nesting areas from April 1, to July 1, this also limits the use we can make on the federal range and includes a good portion of Sabine's privately owned range.

As for the reintroduction of elk into Range Valley 1985-86, we oppose this action because elk and cows compete directly for the same forage.

31.1 Response: Reference is apparently to only one or two of the alternatives. Note that there are other alternatives where no change is proposed. The concerns expressed will be considered before any final decision on future actions is made.

31.2 Response: Reference is to livestock grazing restriction in Alternative B. The restriction to late fall use only is to allow livestock grazing but not during the major boating season, nor during winter and early spring when the residual effects of livestock use would conflict with floatboating use. As stated on P. 59 of the Draft, the floatboating use season is from March to October.

31.3 Response: As stated on P. 31 of the Draft, Alternative C favors watershed, wildlife, and recreation. Livestock production would be secondary. Therefore, the restrictions proposed may not be in the best interest of livestock production. The concerns addressed will be considered prior to any decision on a grazing management program.

This is in the area of our block of private lands and we would be summering them. This would mean working cows around another big game season and the increased use of roads by scouting and hunting of the elk. We also oppose the reintroduction of Desert Bighorn and Rocky Mountain Bighorn in Lower Nine Mile and Desolation Canyon area. I can see no conflict between cattle and mule deer on what is described as critical winter range or critical spring range. I wonder where they spend the summer?

Sabine would be interested in any range developments or vegetation manipulations the Bureau of Land Management might do to increase the forage. Sabine plans to do some fencing, water developments and possibly some spraying or burning on their own private lands as we have stated in our new management plan of which a copy is on file in the Price BLM office. Sabine is interested in protecting and improving our range and protecting the watershed.

31.4 As for the comment on the "wild" horses; I think this should read "feral" horses, because they have escaped from the outfit or were turned loose by others. I also think some mention of predatation by mountain lions and winter kill should be listed as causes of death. They also spend considerable time grazing in on our private property.

The wholeslant of this report appears to favor recreation; boating, hunting, hiking, picnicing, etc. No credit is given to the ranchers who have contributed to the BLM since 1934, or to its predecessor, the Taylor Grazing Service.

I thought the comment of livestock grazing being responsible for the deterioration of Fremont Indian sites amusing, but I've heard of the cow that jumped over the moon.

31.5 In the table # 18, page 68, Estimate Wildlife, Livestock Forage and Boating Values, the livestock contribution appears low compared to hunting and boating but it is in a different light on the preceding page where agriculture is the high contributer on the Income and Employment in Carbon and Emery Counties, Table. I think a deduction of the expense and inconsideration caused land owners and the environment should be deducted from the hunting and boating contribution before it is entered. This should include such things as torn up roads, litter removal, loss of time by employees, time spent patroling property, vandalism, and etc.

31.4 Response: The term "wild" was used because these horses meet the definition of the Wild Horse and Burro Act, i.e., they are unbranded, unclaimed, and running on public land. We do recognize these horses did originate from feral stock. Winter kill is certainly a cause of mortality as it is in all range animals. Predation may be a cause of some mortality. There is very little evidence to show that mountain lion are effective predators on wild horses. Neither winter kill nor predation are significant enough to explain the decimation of this herd from 150 to 25 head in 6 years.

31.5 Response: Table 18 of the Draft does not show livestock contribution, but only the value of public forage in the Resource Area. The economic value of a commodity is what the market price would be if it were sold in a competitive market. This value is not related to local income and employment. The boating, hunting, and forage values were all treated in a similar manner, and external costs, and management costs were not deducted from the value estimates.

Sabine would not object to the chaining of pinon and juniper and the cutting of fire wood, but have it policed and only when livestock are not in the area.

As for a comment on the Wilderness Area, the area is already a National Historic Area and inclueds the Flat Canyon Archaeological District. The Indian Reservation throws excess recreation pressure on the west bank by restricting access on the east side. There are parcels of private land within its proposed boundaries. This area has been historically grazed since the 1880's. There are enough recreation areas along the river and there is no further need to set more land aside into a wilderness area.

Alternative B is similar to A and Sabine has the same objections on this proposal as previously stated.

Alternative C is the fartherest from the Multiple Use Principle and would cause some operators to go out of business because of economic reasons or the elimination of their grazing privileges. It imposes the strictest limitations and comes at a hard economic time for most operators.

Alternative D would be detrimental to the livestock operators; through this no action plan and would eventually decrease the amount forage available. The BLM could modify this by providing range improvements such as chaining, seeding, burning, fencing, water developments and etc. to further increase the amount of forage available for livestock and game.

Sabine would recommend a separate ELS for the Nutter Ranch because it is the largest permittee in the Price BLM district. Also, because of the great variance in altitude, soil variations, vegetative and ecological types, and number of AUM's, The Nutter Ranch has been in business for over 100 years and is dependent upon this resource and needs full co-operation of the BLM to accomplish its long term goals.

Remember, grass is a renewable resource, and is a major factor in Multiple Use.

Preston Nutter Ranch
James K. Brown mgr.

SM/FO Rec'd. NOV 30 1982

(32)

UTAH NATIVE PLANT SOCIETY

Reply to: P. O. Box 6257
SLC UT 84106

Penstemon utahensis

November 27, 1982

Mr. Leon E. Berggren
Price River Resource Area Manager
Bureau of Land Management
P. O. Drawer AB
Price, Utah 84501

Re: Draft EIS
Price River grazing management program

Dear Mr. Berggren:

The following comments are submitted in response to the above-identified draft EIS:

32.1 (1) Inclusion of the map on page 46 (Figure 8) was very helpful. Reference in the final document as to how and when the data for endangered and sensitive plant species was obtained might aid future decision making.

32.2 (2) It is indicated on page 45 that no officially listed threatened plant species exist in the area. Some readers might believe on the face of this statement that no federally listed plant species (endangered or threatened) occur in the area. The final EIS should specifically state that one listed plant (designated as endangered) does occur in the area.

32.3 (3) Did the informal consultation initiated with the Fish & Wildlife Service (page 4) include discussions concerning the listed plant species, Sclerocactus wrightiae? If so, what recommendations were made? Will grazing or any other activities be allowed in the location where this species is found?

32.4 (4) It is noted that site specific inventories will be completed prior to the implementation of any project (page 18) and that adverse impacts to the listed and candidate plant species will be avoided by surveys and other protective measures (page 79). It is assumed that reasonable buffer zones would be established if rare plants were encountered in a project survey. An overlay of the rare plant location map on page 46 and the proposed vegetative manipulation projects might more clearly reveal potential conflicts.

32.1 Response: See Revisions and Corrections section under P. 45 and References Cited for inclusion of references on endangered, threatened, and sensitive plant surveys in the area.

32.2 Response: The text has been changed to clearly indicate the presence of one federally listed endangered plant species in the area.

32.3 Response: The informal consultation with the Fish and Wildlife Service did not include any discussion of the listed plant species Sclerocactus wrightiae. There exists some controversy as to its presence in the area; however, it was included because its presence is suspected. The effects of grazing on this species is not clearly known, but most cactus of this genus are apparently not adversely affected by grazing. The area is presently grazed by cattle, and cattle grazing is proposed in all alternatives analyzed in the Draft.

32.4 Response: Overlays, based on larger-scale maps, have been prepared showing threatened, endangered, and sensitive plant species, and areas suitable for vegetation manipulation projects. These overlays will be used in the planning and implementation of any projects to insure that any conflicts are identified and resolved.

32.5 (5) It is strongly recommended that no sheep or cattle grazing be allowed in areas where listed or candidate species occur. Livestock restrictions for this reason could be added to existing tables contained in the draft for alternatives B & C if the corresponding allotments aren't already included.

32.6 Erigeron maguirei requires special management attention. The total population of this species may be less than 100 plants making it one of the rarest plants in the West. A Fish & Wildlife Service botanist found only 7 total plants this spring in a thorough investigation of 10% of this species' entire distribution. Grazing is a very real threat to the survival of this species. More study is needed. No action should be taken that will potentially impact this species.

Other rare plant species occurring inside or just outside the area will be adversely impacted if grazing is allowed in or near their habitats including Pediocactus despainii.

(6) Alternatives A & D are clearly unacceptable. The declining watershed condition, lack of livestock restrictions and loss of 79,000 acres make alternative A an undesirable choice. Continued degradation of the area's ecological systems and the poor condition of the present range make alternative D an unwise selection.

Alternative C is the preferred choice since it is the only one that would improve riparian areas and upgrade the general ecological condition of the area. Without this type of management, future water needs will probably not be met. While adoption of this alternative would most affect current livestock operators, it is very significant that most operators are part-time ranchers and derive less than half of their income from livestock (page 45) and that their short term income losses would inevitably be reversed in the long term with greater future production capability.

Thank you for considering these comments. A copy of the final EIS would be appreciated.

Very truly yours,

UTAH NATIVE PLANT SOCIETY

Anthony J. Frates

Anthony J. Frates, President

AJF:t

32.5 Response: The effects of grazing on these plant species is not well known, and some may actually be benefitted by grazing. Dr. Stanley Welsh in the publication, "Illustrated Manual of Proposed Endangered and Threatened Plants of Utah", does not list grazing as "Existing or Potential Threats" (except for Erigeron maguirei). Livestock trampling could be a threat to some species. Because of the lack of documented impacts from cattle and sheep grazing, no livestock restrictions are proposed in this EIS.

32.6 Response: The information is appreciated. The plant Erigeron maguirei was not on the list of candidate species received from the Fish and Wildlife Service as occurring in the area. Its presence in the area had been previously determined and it was included in the Draft EIS. In keeping with the BLM policy to protect sensitive plant species, no actions will be taken that would further endanger this species.

(33)

[illegible] Rec'd. DEC 16 1982

To: District Manager, Gene Nodine

Attached are the comments of the Moab District Advisory Board on the adequacy of the Price River EIS.

Sincerely yours,
D L Taylor

D.L. Taylor

33.1 1. Previous management and range surveys have been largely ignored in this statement. Range trend is ignored and we feel the trend is in general upward and does not justify the proposed cuts and season of use changes.

33.2 2. We are opposed to cutting to the average use for a 5-year period. This does not allow any flexibility for increased stocking on good years and the 5-year period suggested (1976-80) included a severe drought year (1976) which was the most extreme in many years. The monitoring program should establish correct stocking rate which we believe will be much closer to the actual preference than past 5 years actual use.

33.3 3. The eight treatments suggested are biased in favor of wildlife and ignores the fact that livestock can be controlled and used as a tool in proper range management. Water development is ignored.

33.4 4. There are thousands of words to describe the adverse impacts of livestock grazing in the spring and in overused areas. Little is said about the same impacts of wildlife. Also, wildlife use cannot be controlled except by delayed number cuts by hunting if DWR agrees to sell more hunting permits.

33.5 5. Plan B shows small increases in livestock use but the increases probably would not result because the loss of nearly all spring use would force most operators to cut numbers due to the resulting in-balance in year long feed. Also it assumes that the one-third who get increases would in fact use the increase. This is not likely since the operator would have to find a home for the increased numbers for the rest of the year.

33.1 Response: On an areawide basis, there have not been any comprehensive range surveys or trend studies since the 1960 ocular reconnaissance survey done in 1960 when the last adjudication took place. Information on active preference, average licensed use, and vegetation manipulation projects was included as a baseline of previous management. Observed apparent trend is available on some allotments, but it is sometimes subjective and is also subject to doubt. Trend studies will be a part of monitoring incorporated prior to any changes in the grazing program.

33.2 Response: This proposed allocation is part of Alternative B on M and C category allotments only. Other levels of grazing are proposed in the other alternatives including no change. No changes in allocation would be made without monitoring to establish the correct stocking rate.

33.3 Response: The treatments suggested are based on the fact that livestock can be controlled and used (Treatment 8) as a tool in range management. As stated on P. 11, water developments (other range improvements) will be designed during AMP development as needs are established and grazing systems developed.

33.4 Response: See response to comment 8.3. The adverse impacts of wildlife, especially deer, are acknowledged and the need for herd reduction on some units is indicated in the Draft and has already begun. Nevertheless, the impacts of livestock grazing in some areas was considered more significant and are also additive to the impacts of wildlife. Therefore, since livestock can be more readily controlled, restrictions and allocation levels were proposed in some alternatives to correct existing problems. Herd reductions on deer herd units are controlled by the Board of Big Game Control which includes representatives from the Utah Woolgrower's Association and the Utah Cattlemen's Association.

33.5 Response: The economic analysis of Alternative B does make the assumption that forage allocated (increases) would be used, but it acknowledges the problems of season of use and refers to analysis in Alternative A. In this analysis the caveat is given (P. 99, second complete para.) that the aggregate positive or negative impact would depend upon how operators adjust to changes in season of use. Adjustments in season of use and forage allocation would not be made without monitoring studies and/or consultation with the individual operators and, as appropriate, the Grazing Advisory Board.

6. These cuts and increases should be reallocated between producers rather than for increased game use. We especially oppose introduction of new species while the majority of livestock producers are being cut. Part of the excess sheep AMs could go to cattle rather than game increases.

33.6 7. The Board feels that another of the wildlife biases was in the feed requirements used to establish carrying capacity. Antelope at 85 pounds compared to sheep at 130 pounds, elk at 390 pounds and moose at 670 pounds are too low compared to cows at 800 pounds.

33.7 8. Season of use changes present a serious problem to many operators. We recognize that spring use is critical to range plants but it is also a critical time for livestock. We feel that management on each allotment could alleviate most spring problems rather than cutting all spring use as suggested in Alternatives A, B, and C. The game you want to increase also graze in the spring and you have no control over where they graze.

33.8 9. Allotment boundary changes should only be made after consultation with the permittees concerned and the Grazing Advisory Board. Underutilized allotments should be used to relieve problem areas on other allotments rather than being allocated to game increases.

33.9 10. Alternative A which was supposed to maximize livestock made no effort to increase livestock significantly. It did not advocate the development of additional water.

11. In conclusion, we feel that during a period of depressed economic activity in our State and Nation, that a plan which advocates cuts of 58 percent on two-thirds of the cattlemen and even worse, cuts of 95 percent on 60 percent of the sheepmen cannot be defended.

33.6 Response: The figures used were developed by work group of 15 members representing various disciplines and organizations including USU, BYU, Utah Woolgrowers, UDWR, Utah Department of Agriculture, SCS, and BLM. The forage requirement recommendations were based on the consensus of this group and no bias was noted. The sheep, mule deer and elk figures assume predominantly winter use on BLM lands.

33.7 Response: See response to Hearing Comment 4.2. Grazing systems or other types of management may be used in place of season of use changes to benefit range plants.

33.8 Response: Allotment boundary changes would be made only with consultation and agreement of the operator(s) and where necessary the Grazing Advisory Board. Allocation of underutilized forage could be allocated by mutual agreement on a temporary basis to other operators. If it is not so utilized, it is logical that game herds in the area would utilize at least some of it.

33.9 Response: The SVIM model allocated forage by grazing animal species preference and diet. This model indicated an abundance of sheep forage and less cattle forage than currently allocated. Consequently, in Alternative A, sheep forage allocation increased from 40,955 AMs to 172,867 AMs, a 422 percent increase. Cattle AMs decreased to 39,435 AMs from current active preference of 45,076 AMs. Under current BLM policy, established after printing of the Draft, this model will no longer be used for forage allocation. Water development would not increase AMs available, but would allow better livestock distribution and prevent overuse in some areas.

REVISIONS AND CORRECTIONS

This section contains the revisions and corrections made to the Draft Statement. Not included are the revisions or corrections made to the title page, summary, and Chapter 4 which have been reprinted, as revised, in this Final Statement. All page numbers listed below refer to the Draft and are in numerical order.

Page TC-1, Summary page numbers should read: S-1 through S-6.

Page 1, second para., last sentence should read:

Studies have also identified approximately 61,000 previously untreated acres as suitable for vegetation manipulation to achieve potential vegetative production capacity.

Page 4, second para., replace the second sentence with the following:

Current preliminary estimates of salt loading are 15 and 20 percent, respectively, of the total entering the Colorado River. The effects of grazing management on salinity and sediment inflow to the Colorado River will be considered. The contribution of overland flows from rangelands could be significant; however, the potential for improvement is regarded as slight.

Page 14, Seasons of Use, add the following to the second paragraph:

They were based strictly on the vegetation present on individual allotments. The proposed seasons of use assumes that no grazing system is presently or potentially in place which would provide the needed rest. Because of the high degree of variability between livestock operations, alternatives schemes were not proposed or analyzed. Prior to implementation of season of use changes, alternative courses of action will be explored with the affected operators, and grazing systems may be implemented in lieu of season of use changes.

Page 14, Implementation Schedule, replace the first paragraph with the following:

Figure 3 diagrams the general implementation schedule. Under BLM policy (Instruction Memorandum 82-650 issued after the Draft was printed), adjustments to livestock grazing use cannot be based solely on range inventory data. Adjustments must be based on monitoring or monitoring combined with inventory data, or by mutual agreement.

It is assumed that decisions to increase preference or initiate rancher-desired season of use changes will be more easily reached by mutual agreement than will adverse decisions. Changes in grazing use will be monitored to determine if the changes should be made permanent. Through consultation with the individual operators, alternative courses of action will be considered. The primary goal of this consultation will be a mutual agreement which resolves the problems and issues identified with each allotment without adversely affecting the range users. Consultation will also identify the location, type, and intensity of monitoring to be used on the allotments.

Page 16, Monitoring, add after Table 2:

Other monitoring studies including, but not limited to, frequency, cover transects, photo plots, and/or transects may be used separately or in conjunction with characterization studies. The allotment categorization system will be used to determine the allocation of resources (money and manpower) available. First priority will be I Category allotments. Second priority is M and C Category allotments where changes in grazing use are implemented, and third priority is M and C allotments where no changes in grazing occur.

Page 19, 25, add the following sentence to the Livestock Season of Use sections:

The proposed season of use changes are based solely on plant phenology studies and represent the best season of use for maximum sustained vegetative production. Additional restrictions may be imposed to protect big game ranges, watershed, etc.

Page 23, change text to read:

Table 4 shows acres that would be affected, including maintenance on 18,326 acres previously chained, and net cattle AM gains anticipated.

Page 25, ALTERNATIVE B - PLANNING RECOMMENDATION, first para., delete second sentence.

Page 32, Table 8, adjacent to critical elk winter range, add:

Spring Canyon

Adjacent to high priority antelope range, add:

Columbia, Church Flats, and Fan Canyon

Page 35, ALTERNATIVE D - NO ACTION, first para., last sentence should read:

Under present BLM policy, this is the management preferred alternative for initial action on all allotments.

Page 41, Vegetation Data Base, add the following paragraphs to the end of the section:

The vegetative production data used in the Price River Grazing Management Draft EIS were collected during the 1978-1980 field season, using accepted Bureau methods. These data were needed to help determine areas suitable for continued livestock grazing and to provide the basis for developing a rangeland management program and management alternatives.

The vegetation production data have also been used to identify and analyze impacts and mitigation of proposed action and alternatives. Reviewers of this EIS should recognize the limitations of vegetative inventory data. While these data are adequate for purposes of planning and analysis, they must be supported by results of monitoring studies before making adjustments in livestock use on public lands in the Price River Resource Area.

Page 45, Threatened, Endangered, and Sensitive Plants, second sentence should read:

One officially listed endangered plant species occurs in the area, but there are no officially listed threatened plants known to occur (Welsh, 1977; Welsh and Neese, 1980; Foster, 1979; BLM, 1982).

Page 48, Major Grazing Wildlife Species, add moose after Rocky Mountain bighorn sheep.

Page 50, Figure 10, The distinction between "Elk Critical Habitat" and "Desert Bighorn Sheep Yearlong Habitat" is not clear due to similar shading. The southern areas labeled "Elliot Mountain" and "North San Rafael" are desert bighorn sheep yearlong habitat. The remainder of the darkest-shaded areas are "Elk Critical Habitat".

Page 56, Wild Horses, first sentence should read:

A small wild horse herd exists in the Green River North Allotment (4049).

Page 56, Watershed, last three sentences should read:

The majority of soils are in the climatic groups Desert, Semidesert, Upland, Mountain, and High Mountain. Riparian or Wetland groups include Wet Meadow, Wet Stream Bottom, Semiwet Stream Bottom, and Semiwet River Bottom. Miscellaneous areas include Badland, Gypsum-land, Rock Outcrop, and Irrigated.

Page 57, first para., second sentence should read:

These include the Avalon, Bributte, Chipeta, Persayo, Ravola, Toddler, and WL series, and the Gypsum-land and Badland land types.

Page 57, fourth para., first and second sentences should read:

These saline erodable soils have a great effect on local and regional water quality. When wetted the associated salts are brought into solution.

Add after third sentence:

Preliminary estimates of salt loading from overland flow in the Price and San Rafael drainages are 15 and 20 percent, respectively, of the total entering the Colorado River from those drainages.

Page 75, Range Condition, second para., last sentence should read:

On mixed grass and shrub range, dual use would result in use of both shrubs and grass so that neither would have a competitive advantage.

Page 95, Watershed, last para., change last sentence to read:

If wells are required, the water produced in some areas may be too saline for livestock use (Lines and Plantz, 1981).

Page 98, Table 25, add the following line to the bottom of the table:

Returns to Labor and Investment	281,480	1,530,740	No Change

Page 110, Watershed, third sentence should read:

Cattle imprint the soil more deeply, but with more sheep in an area making more hoofprints, the net result may be similar; however, without specific studies the effect is not quantifiable.

Para. 2, third sentence should read:

This would reduce erosion, sedimentation, and salinity, as discussed in Alternative A.

Para. 3, last sentence should read:

This is about 35 acre-feet less than the demand would be if livestock were grazed at the active preference level.

Page 121, second para., second sentence should read:

Gains would also be made in the Lost Springs Wash drainage which has severe gully erosion along with piping, especially in the younger, smaller gullies.

Page A3-1, third para., the correct address is:

Bureau of Land Management
Denver Service Center
Division of Data Base Administration
Branch of User Design (D-212)
Denver Federal Center, Building 50
Denver, Colorado 80225

References Cited, add the following references:

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